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ABSTRACT

Because older women have been conspicuously absent from Comprehensive Employment and Training Act (CETA) employment and training programs, this advocacy manual focuses on the employment needs of middle-aged and older women. The manual is divided into nine sections. The first section examines CETA itself, both in law and regulations, and discusses how it functions in practice, especially on a local level. Section 2 focuses on the older woman in terms of the displaced homemaker, the older worker, and the CETA connection. Section 3 details the proposal-writing process followed by a section (4) on "blue sky" proposals, which encourage innovative, job-creating ideas. Section 5 discusses the data game, while section 6 presents contradictions and pitfalls of the data game and how to work around them. Section 7 presents information on the theory and practice of advocacy, and legal rights and redress are discussed in section 8. The final section presents ideas for future action. A list of resources, glossary of CETA terms, and other related materials are appended. (BM)

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HOW TO TAME THE CETA BEAST

AN ADVOCACY MANUAL FOR OLDER WOMEN

WITH CARTOONS BY *bülbül*

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OLDER WOMEN'S LEAGUE EDUCATIONAL FUND September, 1979

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HOW TO TAME THE CETA BEAST

An Advocacy Manual for Older Women

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PREFACE

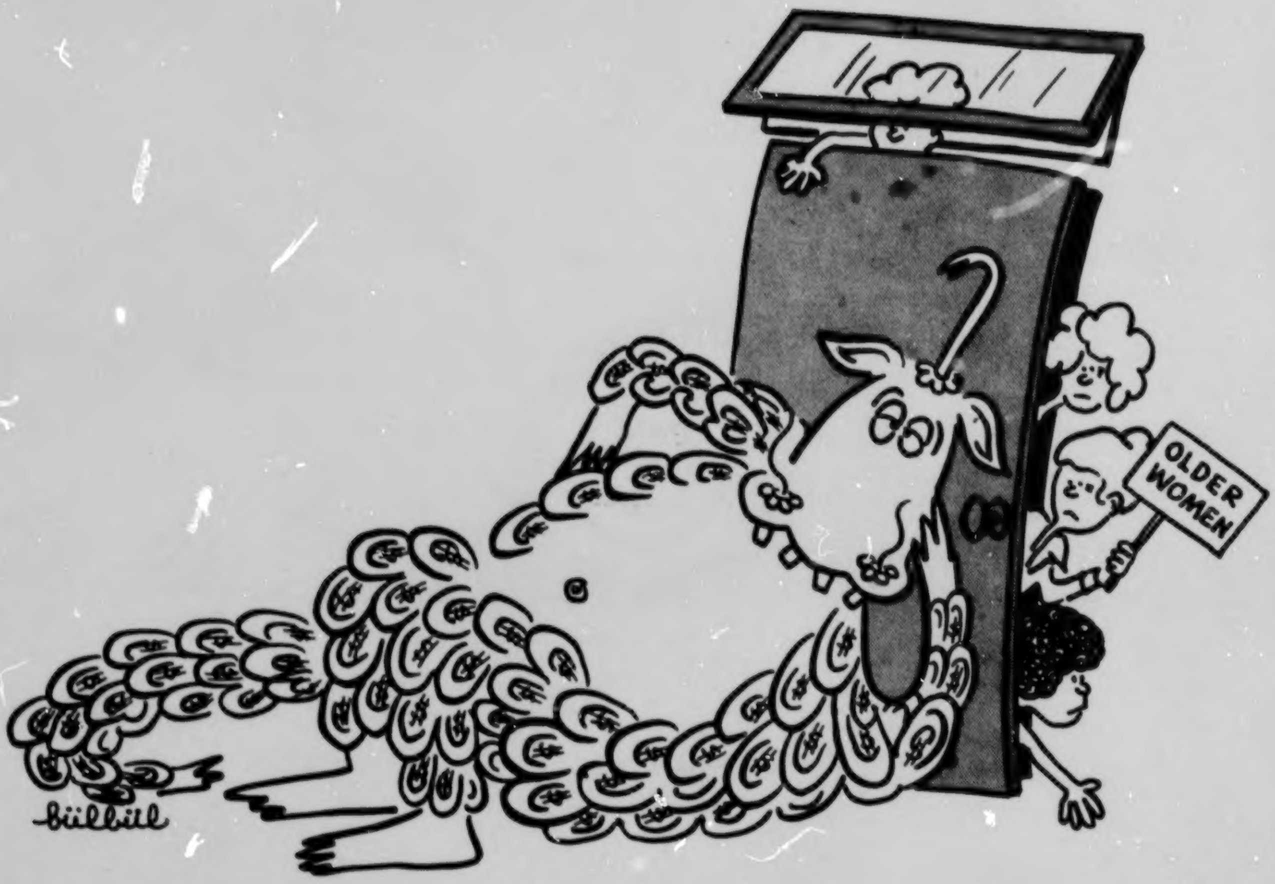
Why did the Older Women's League Educational Fund (OWLEF) prepare this manual? First, because older women have been conspicuously absent from CETA employment and training programs, yet many need them desperately. Second, because it's hard to break into an entrenched bureaucracy which already has an established list of service providers. Last but not least, CETA-speak needs demystifying with a touch of humor to ease the task of sifting through the required piles of paperwork.

If the classic definition of a camel is a horse designed by a committee, then CETA is a beast designed by many committees -- of the House, Senate, Department of Labor and finally, the local Prime Sponsors. We visualize the beast as a Dr. Seuss-like creature, well-intentioned if a little weird, slow to learn but teachable. We believe the CETA beast CAN be tamed, and this booklet tells how.

The manual was a group effort. Tish Sommers conceived and coordinated the project, Andra Pearldaughter was researcher and drafted several sections, Laurie Shields contributed creatively throughout, Donna Ambrogi drafted the section on legal rights and redress, and Gail Antler developed advocacy material for the aging field. The cartoonist, Bülbül, is Genny Guracar, who tailored a beast according to committee specifications and drew all the cartoons. Martha Gresham edited and typed the manual with Margaret Malberti, who also handled production. Suggestions came from many sources, especially from Cynthia Marano, Barbara Dudley, Cynthia Gorney, Sandra Burton and Spring Friedlander.

This manual is seen as supplementary to the excellent materials prepared by the Women's Bureau of the Department of Labor, listed under resources. Ours is a grassroots version with a touch of irreverence, which necessarily has a different thrust from that of a government agency. It has the specific focus of middle-aged and older women, because their employment needs have been largely ignored, and are likely to remain so until specific advocacy on their behalf is developed, with older women in the forefront.

While some specifics will soon become outdated (and will be periodically revised), the basic premises for advocacy presented here are likely to remain constant for some time to come. Over the long run, the CETA beast could become a pet.


OLDER WOMEN
bülbül

INTRODUCTION

Suppose you are painfully aware of the energy crunch. You think of the contribution that older women could make to promote conservation -- women who learned at first hand to stretch almost everything during the depression and World War II. Wild as the idea might be, suppose you conceive a corps of home conservation specialists to visit traditional women's organizations, senior centers, churches, etc. to collect ideas from "the American people" on how to reduce energy waste. Realizing that direct involvement, rather than relying solely on media, helped make the rationing plans of World War II effective, you see these persons as information gatherers as well as promoters of conservation. For when people contribute to a plan of action they are far more committed to its success.

You recognize, of course, that pilot projects would have to precede national acceptance of such a plan, but you wonder if the older women's program, of which you are a part, might not be able to develop such a project and team up with the local utility company, which has been making overtures about conservation. Could CETA be the missing link, the answer to the obvious question, "But who will pay for it?" If so, what kind of a proposal should be written? Where and when do you present it? Are there other possible sources of funding besides the local CETA office? How do you break into the system?

This manual is written to help answer these questions for the person who senses the potential of CETA if one only knew how to use it. It is for older women and their advocates who already have a foot in the door and for those who don't know what the initials stand for. It is for the person who is used to working in the "system" and for the one who has always been an outsider. Some parts will be useful to the displaced homemaker who is trying to get a program started in her community, while the leader of a continuing education program in a community college will find other sections pertinent. It is for a concerned member of an advisory body for an Area Agency on Aging who wants to improve employment potential for older persons, a woman's center director, frustrated with keeping her agency afloat, and for an advocacy group which has no interest in seeking federal funds but wants to assure that these monies are spent for their rightful purpose. It is for the person who has tried to crack CETA before and been turned down or for those who feel they have experienced age and/or sex discrimination, as well as those who think CETA is great, but would like to learn some new angles. Use it in conjunction with the "official" materials listed in the resource section, and skip sections that you already know. Hopefully, there is something in here for everyone.

Why mess with a big bureaucracy like CETA in the first place? Especially since this year's CETA is reportedly much tougher than the old one. Because for older women out of the labor force twenty or more years, the pickings are slim indeed. CETA could be a springboard to the jobs that do exist or can be newly created. Our taxes pay for this service and it must be made responsive to our needs.

Second, why spend the energy learning a new language (CETA-speak) comprised of initials and catch phrases? Why cope with innumerable roadblocks such as needs assessments, formal proposals, unrealistic deadlines, etc?* Because there is no way to use an institution effectively without learning its terminology, its structure, its internal politics. Acceptance of public funds necessarily imposes a price. There is no free lunch in government.

Why try to crack an institution which is sexist, ageist, and which has fostered dead-end employment tracking for women? Just because CETA has been that way in the past doesn't mean it needs to remain so. But it will change only when there is a concerted push to make it reflect our needs, both by those utilizing its funds and advocates on the outside.

For constructive social change, the ingredients are: (1) information, because knowledge is power; (2) techniques of institutional guerrilla warfare; (3) assertiveness, which includes risk-taking; (4) commitment, the most fundamental of all. The first and second are covered to some extent in this manual; the last two are yours to add.

First, we will examine CETA as it is written, both in law and regulations, then discuss how it functions in practice, especially on a local level. We will zero in on the older woman and detail the proposal process including its own style of politics. A section on "blue sky" proposals is offered to encourage innovative, job-creating ideas. The data game is analyzed with some methods for turning it to your advantage, followed by other contradictions and pitfalls with ideas on how to work around them. Advocacy principles and models are presented, including legal rights and redress. The manual concludes with ideas on where we go from here.

It is never easy to break into a bureaucratic structure, but without local initiative nothing will change. With a good push, older women will at least crack open the door. Once inside, the beast is ours for taming.

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*See Appendix

I. WHAT IS CETA?

PURPOSE: In its own words,

> *It is the purpose of this act to provide job training and employment opportunities for economically disadvantaged, unemployed, or underemployed persons which will result in an increase in their earned income, and to assure that training and other services lead to maximum employment opportunities and enhance self-sufficiency by establishing a flexible, coordinated, and decentralized system of Federal, State, and local programs. It is further the purpose of this Act to provide for the maximum feasible coordination of plans, programs, and activities under this Act with economic development, community development, and related activities such as vocational education, vocational rehabilitation, public assistance, self-employment training, and social service programs.**

HISTORY

That is what the Comprehensive Employment and Training Act is supposed to do. In fact, those have been substantially its goals since it was originally enacted in December, 1973, marking a turning point in Department of Labor (DOL) employment and training policy. From a centrally administered array of "categorical" programs, designed for specific categories of people, CETA shifted decision making and financial control to states and localities. Local government was said to "know best the community employment needs". CETA followed on the heels of revenue sharing which provided block grants, allocated to mayors, county executives and governors, who in turn decide which programs should be financed and which contractors, or subgrantees, should operate them. But of course the federal government does not give away money without regulations (regs) based upon the sometimes conflicting specifications of the legislators who passed the law.

The original 1973 CETA legislation provided a large training program (Title I) and a smaller public service employment (PSE) program (Title II), designed to provide temporary employment for the "structurally unemployed" (persons who can't find jobs even in good times). With the rise of unemployment in 1974, a new PSE program was added for the "cyclically unemployed" (persons who had lost jobs with the downturn of the economy). This was further expanded in 1977.

As Congress considered reauthorizing CETA for four more years in 1978, many criticisms surfaced. While CETA was supposed to give a leg up into the work force for all people who have little or no training and who face barriers such as racism, sexism and ageism, training programs were, in fact, largely centered on the young, and public service employment became an avenue for hard pressed municipalities to substitute CETA for laid-off government employees.

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* 29 U.S.C. §801. Federal statutes are organized topically into the United States Code. Each topical grouping is called a title, subdivided into sections. The above cite would be read "Title 29 of the United States Code, Section 801". All citations to the Act will be in this form, giving the relevant title and section of the U.S. Code. The U.S. Code is in all law libraries, which are open to the public. Ask the librarian for assistance.

Local government indeed knew what they needed -- a supplement for local payroll. Rather than creating new jobs, federal public service money was diverted into supporting functions that otherwise would have to be paid by state and local government. CETA employees were handling middle management duties, with local supplements to federal salaries, and education and experience levels required for many CETA jobs were far beyond those for whom the legislation was intended. 1978 hearings in both the House and Senate were rife with examples of fraud, misuse of CETA, and of persons of moderate income on CETA roles.

Out of these controversies came the CETA reauthorization of 1978, signed by President Carter in October. Tighter eligibility requirements endeavored to ensure that the truly disadvantaged would be served. With unemployment levels considerably lower, Congress greatly reduced the old Title VI countercyclical program, to be activated only in time of high unemployment. "Substitution" of CETA public service employment (PSE) for local government payroll was curbed, and the private sector became the new knight in shining armor expected to slay the dragon of unemployment. Most important from the viewpoint of older women, the Act added "displaced homemakers" to CETA targeted groups and gave an honorable mention to older workers.

Several factors helped bring about this new interest. Displaced homemaker legislation became the activist focus of older women, supported by women's organizations of every stripe. Twenty-nine legislatures introduced or enacted state displaced homemaker bills, national legislation was revised into an amendment of the CETA reauthorization Act, and grassroots pressure assured inclusion of displaced homemakers as a disadvantaged group. In fact the media, entranced by "America's number one lady in distress", helped make displaced homemaker a Washington buzz word. (For more on this, see Chapter II, CETA and the Older Woman.)

In regard to inclusion of "older worker" within the Act, this segment has always been there in theory, but neglected in practice. The 1978 CETA, however, adds some new language on the subject, but this too will lie dormant unless there is local action for implementation.

Is CETA AGEIST and SEXIST?

The United States Commission on Civil Rights was commissioned by Congress (Age Discrimination Act of 1975) to conduct an in-depth study of age discrimination in federal programs, including CETA. The results provide a devastating documentation of exclusion and of rationales for that exclusion. Enrollees for Title I training programs (Fiscal Year 1976, the year studied) for persons 45-54 totaled only 4 percent; age 55-64, 1.9 percent and, over 65, .8 percent. Although CETA is mandated to distribute program funds and services equitably to those segments of the labor force burdened with high unemployment, the public service jobs program (Title II and VI combined) included only 5% of persons over 55, at a time when unemployment more than doubled for persons in that age range.

According to the study, "At age 45 the ratio of persons enrolled (in all CETA programs) to those unemployed declines sharply. Persons in each of the age groups over 44 are enrolled at less than half their proportion of the unemployed population".[*] Since official unemployment figures of older persons, especially older women, are grossly underestimated, the actual discrepancy is much greater. It never occurs to many older people to apply to CETA for services, because they are well aware of the invisible sign, "Older persons need not apply". That sign must be torn down!

CETA is rife with sex as well as age bias. The primary complaint of women's organizations is "sex tracking" of women into traditional lower paid jobs and virtual exclusion of women from skilled trades.[**] For older women, there is a compounding effect of age and sex discrimination. As stated in *materials prepared for the study*, "We have reason to believe...that age combined with sex produces a double jeopardy situation; more so it appears than when coupled with race". There is no hard evidence because CETA figures were not computed by age *and* sex, nor were age figures required for Equal Employment Opportunity information, so the problem of compounding age-sex bias has remained invisible. However, the 1978 CETA requires cross-classification of data by age and sex* as well as other handles for action on behalf of older women. With advocacy efforts and perhaps a law suit or so, CETA's record can improve on this score too.

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[*] Age Discrimination Study, Part II, p. 134. See Resources.

[**] Women's Work Force, "Shortchanged and Slighted". See Resources

ANATOMY LESSON

To tame a beast, first learn as much as possible about its anatomy, habitat, and feeding patterns. Learn its good side and bad, when best to approach and from what direction. And be sure to carry a lump of sugar and a stick. Best place to start is to read the Act itself (see Resource list), but this brief anatomy lesson is offered to help keep sane while coping with mounds of legalese and bureaucratic jargon.

Like many laws, the CETA Act is divided into titles which spell out their specific provisions. Think of them like chapters in a book. Here is a summary prepared by the Women's Bureau**:

> Title I - Administrative Provisions consists of two parts. Part A - Organizational Provisions covers such matters as eligibility for prime sponsorship, requirements for master and annual comprehensive employment and training plans, judicial review of action by the Secretary of Labor to terminate financial assistance because of failure to comply with the law, membership and duties of prime sponsor planning councils and State employment and training councils, and authorization of appropriations. Part B - General Provisions covers such matters as wages and allowances (including allowances for each dependent over two up to a maximum of four additional dependents), labor standards, prohibitions against political activities and discrimination, reports to Congress, and Federal access to records.
>
> Title II - Comprehensive Employment and Training Services has four parts. Part A - Financial Assistance Provisions has the formula for allocation for the basic program, including supplemental vocational education assistance. Part B - Services for the Economically Disadvantaged lists general activities for youth, older workers, and public assistance recipients. Part C - Upgrading and Retraining sets standards under which public and private employers may provide upgrading and retraining programs, including supportive services. Part D - Transitional Employment Opportunities for the Economically Disadvantaged has the allocation formula and eligibility and wages standards for the program under which economically disadvantaged persons who are unemployed are given transitional public service employment that is designed to enable participants to move into unsubsidized employment.

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* See page 57 for discussion of cross-classification.

**Review of CETA Reauthorization, U.S. Dept. of Labor, Women's Bureau. See Resources.

Title III - Special Federal Responsibilities covers generally many of the areas in title III of the former law. In Part A - Special National Programs and Activities, the Secretary of Labor is directed to undertake programs to meet the employment-related needs of certain groups who face particular disadvantages in specific and general labor markets or occupations. Part B - Research, Training, and Evaluation requires the Secretary to establish a comprehensive program of employment and training research to aid in the solution of the Nation's employment and training problems (one program the Administration intends to undertake under these provisions is a demonstration of the job component of its welfare reform proposal). It also requires the Secretary to develop and make publicly available a comprehensive system of labor market information and to provide for the continuing evaluation of activities under the act and the extent to which they meet the needs of various groups.

Title IV - Youth Programs, which formerly related only to the Job Corps, also includes youth employment demonstration programs and the summer youth program--both transferred from the former title III.

Title V - National Commission for Employment Policy continues the advisory body formerly known as the National Commission for Manpower Policy, with some change in membership and several additional functions.

Title VI - Countercyclical Public Service Employment Program authorizes a special program to provide for temporary public employment during periods when the national rate of unemployment is high.

Title VII - Private Sector Opportunities for the Economically Disadvantaged is a new initiative intended to demonstrate the effectiveness of a variety of approaches to increase the involvement of the business community, including small business and minority business enterprises, in activities under the act, and to increase private sector employment opportunities for unemployed or underemployed persons who are economically disadvantaged. Prime sponsor activities under the title are to augment private sector-related activities under title II, including arrangements for on-the-job training with private employers.

Title VIII - Young Adult Conservation Corps continues to cover the program established last year under which unemployed individuals aged 16-23 are referred by the Secretary of Labor for year-round projects administered by the Secretaries of the Interior and Agriculture. Participants are assigned to residential or nonresidential centers and work in such areas as tree nursery operations, wildlife habitat improvements and preservation, and recreation development. An amendment adds public assistance agencies to the list of sources from which the Secretary of Labor is to seek referral of candidates.

YOU AND YOUR PRIME SPONSOR

If you live in a city or county with a population of 100,000 or more, that local government is probably your "prime sponsor" (PS), which means agent for administering CETA monies. Smaller political entities often combine as a consortium to function as a prime sponsor. State governments are responsible for administering funds in rural areas not covered by primes, called the "balance of state".*

In most cases it will be the prime sponsor with whom you will be dealing but how do you communicate with a political entity? You deal with the CETA staff hired by the prime to do its business, including planning, contracting, and administration. Larger primes have correspondingly larger and more specialized staff, even perhaps someone responsible for displaced homemaker or older worker programs. Since some CETA offices prefer the public to be in the dark about their functions, it may take persistence and several phone calls just to find some insider to talk to. Part of the mystification process is bureaucratic inaccessibility.

HOW THE MONEY FLOWS DOWN FROM OLYMPUS

First, how much money is there in each of the title-pots? Nothing is simple, as seen in the following chart, but it is clear that Title II is the big spender.

	FY 79	FY 80	FY 81	FY 82
Title II	$5 billion	---	---	---
Title III	20% of total authorization excluding PSE funding			
Title IV	$2.25	$2.4	---	---
Title V	---	---	---	---
Title VI	Funds sufficient to provide jobs for 20% of unemployed over 4%, 25% when unemployment exceeds 7%			
Title VII	$.5	$.525	$.525	$.525
Title VIII	$.35	$.4	---	---

Once a city, county or other governmental unit has been designated a prime sponsor, it applies for funding. The portion of funds which a prime may apply for is determined by a three-factor formula: the prior years funding level, number of unemployed persons and the number of low-income adults. Areas of substantial unemployment (where unemployment was at least 6.5% for any 3-month period during the previous 12 months) receive additional weighting. The bulk of Title II funds allocated to a state is reserved for and sent directly to the primes. The rest is used for state vocational education programs, for programs administered by state governments, state employment and training councils and discretionary programs by the governor.* Title III funds remain under the jurisdiction of the federal Department of Labor (DOL). Called "national programs" either because they are "demonstrations" with national implications or because they affect a larger area than a prime, they are sometimes awarded directly to those providing services, and sometimes to prime sponsors who apply for these funds. How this works in detail for displaced homemaker programs is explained in the next chapter.

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*20 CFR §675.4 Regulations are organized topically into the Code of Federal Regulations. Each topical grouping is called a title, subdivided into parts and sections. The above cite would be read "Title 20 of the Code of Federal Regulations, Section 675.4". All citations to the regs will be in this form, giving the relevant title and section of the CFR. The CFR is in most law libraries, which are open to the public. Ask the librarian for assistance. The new CETA regs are also contained in Vol. 44 of the Federal Register, No. 65, Part IX, April 3, 1979, found at most law libraries. If possible, obtain your own copy of the regs. Individual copies of the CFR title containing the CETA regs can be purchased from the U.S. Government Printing Office, Washington, DC 20402. A copy of the regs may be obtained from the Office of Information, ETA, Dept. of Labor, 10225 Patrick Henry Bldg., Wash. DC 20213, or from the Dept.'s regional offices.

The Department of Labor (get used to the initials, DOL) administers the funding process through its division, Employment and Training Agency (ETA), which has ten regional offices. ** Each one has a Regional Administrator, usually referred to as the RA. This is the intermediate step between the prime sponsor and Washington.

THE PLANNING PROCESS: PUMPING THE PRIME

The Comprehensive Employment and Training Plan (CETP) functions as contract between the ETA regional office and the prime sponsor, and must be approved by the feds before money is made available. It consists of a Master Plan and an Annual Plan. The Master Plan, which need be submitted only once, details the local economic conditions and the prime's administrative arrangements for serving the area. The Annual Plan, filed before the beginning of each fiscal year (starting October 1) includes a description of the eligible population and the planned level of service to each "significant segment" (designated disadvantaged group).

In formulating the Plan, the prime sponsor is required to consult with its appointed planning council, which should be representative of persons to be served, community based organizations (CBO's) and representatives of handicapped individuals. Once completed, the Plan is furnished to the governor, the planning council and other interested groups including the general public for review and comment. These comments must be forwarded to the DOL along with the plan. The DOL then reviews the completed plan to assess the adequacy of performance and goals.***

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[*] See page 40 for discussion of Governor's 4%

[**] See Appendix for listing with addresses

[***] For details concerning the planning process, see Part 676 of the Regs (20 CFR §676)

Why is it important for outsiders to understand the planning process and to have as much input as possible? Because this is where the basic decisions are made: which groups will comprise the significant segments, approximate goals for each group, how will they be served and by whom. Planning, including review of funding proposals starts usually six to eight months ahead of the fiscal year. Remember, the prime sponsor has to justify expenditures under each title.

SUBCONTRACTING

The prime sponsor may subcontract with business firms, government agencies such as schools and the employment service and other established institutions, or with community based organizations (CBO) such as a woman's center. Of special interest here are subcontracts for training, supportive services or public service employment with CBO's. The law, the regulations and official DOL policy include strong and specific language encouraging primes to use CBOs.*

The starting point to become part of the system is the prime's "inventory of deliverers of services".** You get on it by sending in a request in writing. The prime must notify all listed groups when it issues a request for proposal (RFP). The CBO, or other applicant, can then respond with a proposal for a contract. Warning: the time between issuance of an RFP and the deadline is very short. To be in the running a proposal must be practically ready to go.

Chapter III details the proposal process, but the key thing to remember here is that proposals must dovetail with the goals expressed in the prime's annual plan. The prime is accountable to the DOL for producing what it said it would in its plan, and is not likely to respond to ideas that are not specified there. On the other hand, if the prime is not doing what it said it would (e.g., not serving a significant segment adequately), it can be pulled up short before the DOL for not complying with its own plan. For both these reasons it is essential to get as much input as possible into the plan and to know what it contains. As a public document it must be accessible to anyone who asks to see it, but since it is usually thick, you may have to read it in the CETA office.

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* 29 U.S.C. §§813(a)(9) and 825(e), 20 CFR §§676.10-4(e)(3), 676.23(c), 678.3(d).

** See 20 CFR §676.23 for details on the process of selection of deliverers of services.

ROLE OF THE REGS

Every law is fleshed out by regulations (regs) issued by the administering department. After going through the traditional public input process, they appear in final form in the Federal Register (CETA final regs appeared in the April 3, 1979 issue.). They are also printed in the Code of Federal Regulations. You can go to any law library and look at the regs either in the Federal Register or the Code of Federal Regulations. The regs are supplemented periodically by "field memos" from the DOL.

Regs presumably translate the intent of Congress into guidelines for day-to-day implementation of the Act. It is in the regs that the sticky definitions are stated, such as "who is a displaced homemaker?", "what is an older worker?" and even stickier eligibility requirements are spelled out. An advocate who can cite the pertinent regulation, and who is knowledgeable enough about them to know when the prime sponsor is misinterpreting the intent of Congress, can make CETA shape up.

Throughout this manual specific regs are cited which can be used for advocacy purposes. When talking to a CETA planner, an advocate with a marked copy of the regulations in hand will likely be treated with greater respect than a neophyte.

Here are examples of very pertinent regulations for older women:

Definitions*

Alternative working arrangements includes flexible hours, part-time work, and job sharing. This is new recognition by CETA that women and older workers need work structure options.

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*20 CFR §675.4

Artificial barriers to employment are limits on access to employment, such as age, sex, race, lack of child care and absence of part-time work, which are not directly related to an individual's ability to perform.

Community based organization (CBO) means private non-profit organizations which are representative of the community or a significant segment of it. Although regulations recognize agencies serving women as examples of CBO's, agencies serving older workers are not specifically mentioned.

Displaced homemaker is partially defined as an individual who has not worked in the labor force for a substantial number of years but has during those years been providing unpaid services for family members. "Substantial number" is not defined in the regulations.

Older worker is defined as a person who is 55 years of age or older. The focus is on age, not status as a "worker". CETA's stated purpose is both to place older workers who are jobless in jobs and to help those already employed to remain in the workforce.

Unemployed person is defined in part as "without a job". However, in the regs this is construed to mean "seeking and available for work". In the Act itself the term is "wanting and available for work"* a subtle difference but one of importance to older women. The DOL definition would exclude discouraged workers who have stopped seeking work because they have been continually rejected. The definition in the law should be adhered to.

ELIGIBILITY

Eligibility is crucial and tricky. The new CETA requires participants to be both economically disadvantaged and unemployed. "Economically disadvantaged" is defined as:**

- a person who receives welfare, or
- a person whose family income during the last six months prior to applying for CETA would have qualified the family for welfare, or

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* 29 U.S.C. §802(38)(a)

** "Economically disadvantaged", "family", and "f[illegible] income" are defined in 20 CFR §675.4

- a person who has, or is a member of a family that has, during the six months prior to applying for CETA, earned no more than: The federal poverty level (about $6,700 a year for an urban family of four); or 70% of the BLS "lower living standard income level" (about $7,336 in 1977 for a family of four, adjusted to locale), whichever is higher.

The unemployment requirement for Title II training programs is seven days, or to be underemployed or in school. Title II PSE participants must be unemployed for at least 15 of the 20 weeks prior to applying, and have a family income no more than 100% of the BLS lower living standard during the three months prior to applying.

OWLEF worked without success to eliminate that "six months prior" ruling, because not infrequently a woman loses "family" income through divorce or death of spouse, but is considered ineligible because of her husband's earnings. Cases of women caught in this trap should be documented for future changes.

How family income is defined is particularly vital to older women. Make sure that every person who applies knows precisely what counts as income and what does not, because regs may be administered differently by various offices. "Family income" is defined in the regs as all income received from all sources by all members of the family. But what is counted as income? Wages and salary, before deductions, net self-employment income, social security benefits, pensions, alimony, child support. Excluded are: non-cash income (food stamps, barter, etc.), value of owner-occupied property (rental value), public assistance payments (SSI, AFDC), disability insurance payments, unemployment benefits, scholarships or other one-time unearned income, inheritances, annuities, worker's compensation and payments from certain training programs.*

Important to note that income must be actually received. For example, the court may award alimony, but if a woman does not receive it, that is not income. The same for child support.

Who is included in the "family"? Suppose there is an elderly parent or a handicapped child of 16 or more in the home. They could either be included in the family or be considered a "family of one". More members in the family raises the eligibility limit but may also raise the total family income. Sons and daughters over 18 who receive less than 50% of support are not considered family members.

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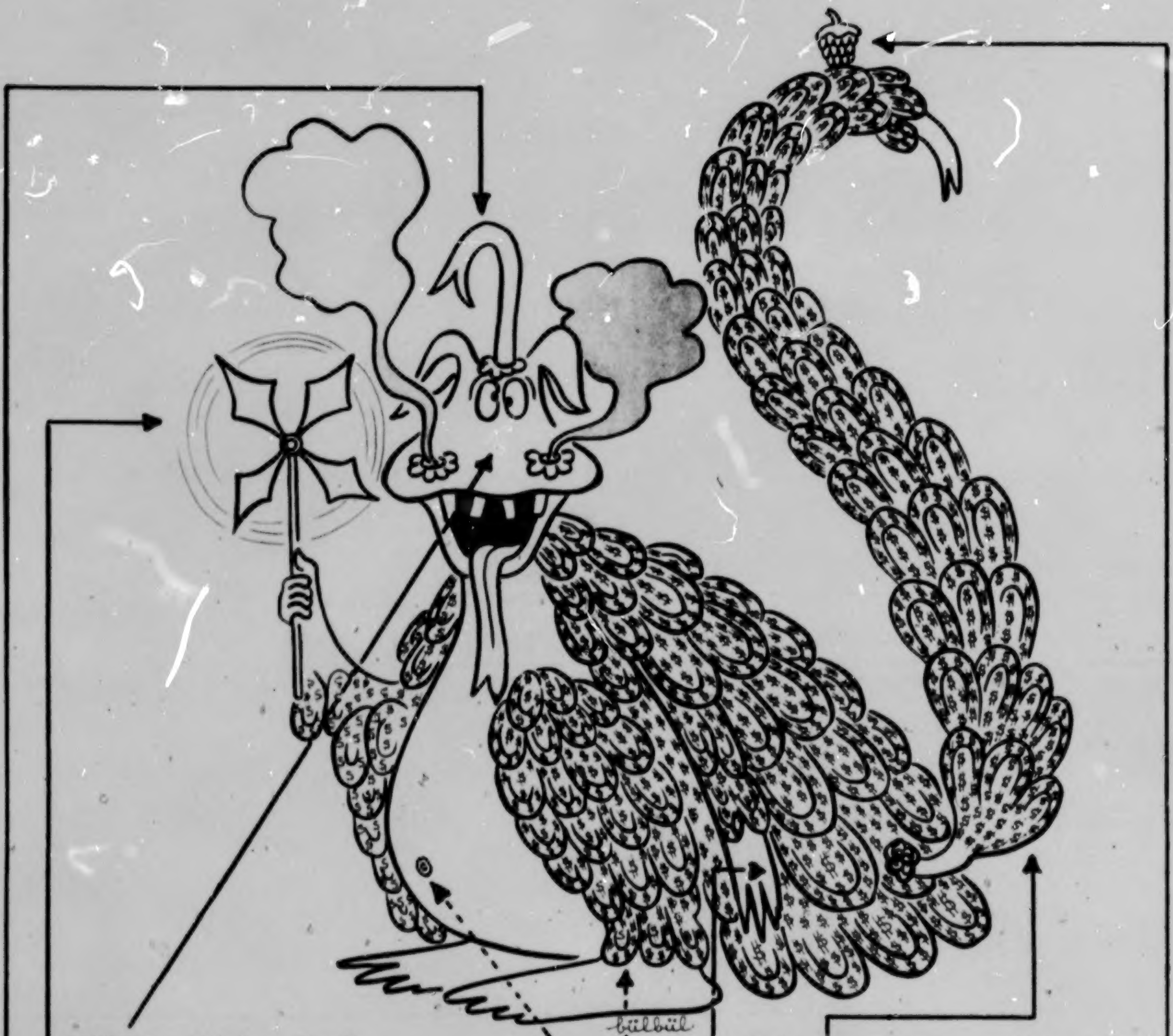
* Includes Older Americans Act Title V, but not CETA PSE or OJT

ANATOMY OF THE CETA BEAST



TITLE I - Admin., teeth loose, lots of smoke, not much fire.

TITLE II - Primes, recently refeathered with crazy glue-harder to pluck. Decorative feathers off limits to bureaucratic pluckers.

TITLE III - Small, special programs. Only moves if whipped up by storm.

TITLE V - Nat'l. Comm. Small appendage, mainly used for scratching head. Regrows when knocked off.

TITLE IV - Serves youth. Tied on with bubble gum. Sometimes wags the beast.

TITLE VI - (Withered arm) anti-recession program. Weak vestige of former muscle. Used for flight in hard times.

TITLE VII - Doorway to business. Great expectations but may be full of gas.

TITLE VIII - Young adult conservation corps. An acorn expected to become an oak, with enough political fertilizer.

SUMMARY AND REVIEW

Enlightened by this brief review, study the CETA beast's portrait. Can you recognize the separate titles? Does the beast seem less formidable? More seriously, what have we learned so far? Hopefully, that CETA can be learned, but it takes work, persistence and some confidence in your ability to cope with an unresponsive bureaucracy. If you go in to your prime sponsor without having learned the law of the land and present what seems to you an obviously great idea on training or employment of older women, you are likely to get a cold shoulder, either because your proposal doesn't fit the annual plan or because other groups who have done their homework take precedence. But the most important lessons come from direct experience. Learn from each snub or setback and return better prepared next time.

Secondly, we have learned that CETA can be cracked. If you know something about the federal regulations and the local plan, have a good proposal and have laid some of the groundwork spelled out later in this manual, and have acquired the assurance fostered by that knowledge, the probability of success is very good. The time was never better to try.

Third, implementation of a law is just as political a process as passage of legislation. It requires vigilant monitoring, mobilizing of support and development of effective strategies. But it is winable. Further techniques will be spelled out on how to do it.

Who are the key players we have identified so far? The CETA professional staff, usually headed by a chief planner or administrator* is the starting place. Other important players will be identified as we proceed.

Fair share. It's the law!

CETA can be reeducated and retrained to provide the legally mandated fair share of services, but it will take sustained effort. To accomplish this, older women and their advocates will need to:

- Be included in the entire planning process.

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* To make it tougher, different titles are used: Manpower Director, etc. CETA is seldom listed in the directory, but often it is under city or county listings as Employment and Training office, Economic Development or other euphemisms. It may take several calls just to locate where the beast is housed.

- Develop viable proposals, within the framework of CETA law and regulations, which will really help older women break through job barriers.
- Mobilize pressure by older women and their allies upon CETA structures. Raise consciousness by any means possible.
- Build self-confidence and group morale in the women themselves, so they can face the realities of the world of work and enjoy the battle.
- Monitor CETA all the way.

The next chapter will provide more information specific to older women, but the basic principle is: KEEP ON CETA'S TAIL.

"What is this rumble from Over-the-hill?"

II. THE BORN-AGAIN CETA AND THE OLDER WOMAN

The older woman falls between two movements and two sets of laws with their corresponding bureaucracies. Out of the women's movement has come anti-discrimination machinery, such as that incorporated into the Civil Rights Act. Fair share for women is a principle included in affirmative action programs both inside government and the private sector, and is the concern of women's organizations of all kinds. On the other hand, a whole aging bureaucracy has grown up as a result of advocacy on behalf of older persons. But the two areas of concern are quite distinct. Although the aging population is predominantly female, sex is generally ignored.

One reason that the compounding effects of sexism and ageism have not been sufficiently recognized is that the aged are desexed. At a chronological cut-off*, a new status is acquired which falls within the purview of different laws, bureaucracies and disciplines, which tend to see their field, the elderly, as separate and distinct. Older women have tended to be invisible in statistics, theories, and social programs in the aging field, but new interest is just emerging, stimulated in part by feminists who have entered the arena. Older women are not included under CETA as a "significant segment" but are included within the terms "displaced homemaker" and "older worker". We will discuss each in turn.

THE DISPLACED HOMEMAKER

Age discrimination compounded by sex exists to the extent that the particular lifespan patterns of women are ignored in the planning and execution of programs. The displaced homemaker is the prime example of discrimination compounded. Because homemaking is not considered work, the woman who loses that job in the middle years through widowhood or divorce is not considered unemployed or manditorily retired. Absent are the usual cushions available to other workers.

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*Chronological ages vary: Older Americans Act employment programs start at 55; other OAA services at 60; the Age Discrimination in Employment Act covers anyone between 40 and 70. "Older worker" in CETA is defined as 55+.

This form of mandatory retirement occurs well before the male retirement age, but the trauma associated with it is quite similar. Too young for social security, but considered too old and "inexperienced" by employers, these women coped with their personal crises as best they could, virtually ignored by policy makers. Now they are recognized by CETA:

> *As enacted by the 95th Congress, the CETA reauthorization (1) specifically identifies displaced homemakers as persons who face particular labor market disadvantages; (2) requires that special emphasis be given in filling public service jobs funded under Titles II and VI of the Act to eligible displaced homemakers; and (3) authorizes the funding of national demonstration programs under Title III, Section 301 (b), to provide displaced homemakers with employment opportunities, appropriate training and other services.**

But concern for specific disadvantaged groups is as trendy as fashion. Stimulated by media attention, injustices long hidden or taken for granted are aired, special interest groups coalesce, and legislators and/or administrators respond with some degree of interest where none existed before. New programs are designed or, more commonly, familiar patterns adapted to accomodate the newcomers.

No such new group emerges without a struggle, including very hard infighting in the political process, and the displaced homemaker movement was no exception. A by-product of women's activism, this movement focused on the particular segment caught in the transition of women's changing roles and expectations. Once the problem was defined, named, and provided with a legislative handle (displaced homemaker bills), activism of a few turned into a genuine movement around the country, leading to introduction or passage of 29 state bills and incorporation of the displaced homemaker into CETA. Other federal programs, responsive to the pressure, adopted the term as well.

Displaced homemakers became a focal point for supportive action by a broad coalition of organizations, including such groups as United Methodist Women, Church Women United, National Council of Catholic Women, YWCA, American Home Economist Association, National Council of Negro Women, League of Women Voters, Business and Professional Women, Bar Associations as well as AAUW, numerous community colleges, women's centers, Commissions on the Status of Women, IWY at Houston, Gray Panthers, N.O.W., the National Women's Political Caucus, NCOA, AARP/NRTA and many others. The support by both women's and aging organizations was a first step in bridging the generation gap in the women's movement. The middle-aged and older woman became a subject of interest in women's studies courses, gerontology conventions, and law conferences. The House Select Committee on Aging published a compendium of papers,* followed by hearings on midlife women. For the women for whom the fight was begun in 1975, invisibility was ended at last.

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* ETA Field Memorandum No. 174-79, 3/6/79 to Regional Administrators.

THE DISPLACED HOMEMAKER UNDER CETA'S TITLES II AND VI

According to the regs, CETA prime sponsors are required to give special emphasis to groups facing particular labor market disadvantages, including displaced homemakers, in filling all PSE positions funded under Titles II and VI. They are also mandated to make special efforts to acquaint displaced homemakers with programs and services available under the Act.

However, the displaced homemaker is included in these titles as one "significant segment" to be considered among many. Since the decision making on which segments will be served rests primarily at the local level, there will be considerable competition from other segments listed, especially from already entrenched groups. Which wheel gets the grease is dependent on how loud the squeak. For example, one ETA Field Memo to Regional Administrators states: "Prime sponsors will be expected to place appropriate emphasis on the provision of such services to displaced homemakers in the filling of all new PSE positions under the Act." But how the word "appropriate" is interpreted will hinge on advocacy on the local level.

TITLE III

The Act states:

> *Sec 301 (b)(1)(A) The Secretary shall make available financial assistance to conduct programs to provide employment opportunities*

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* Women in Midlife - Security and Fulfillment, Select Committee on Aging, U.S. House of Representatives. Washington, 1978. See Resources.

> *and appropriate training and supportive services (through multipurpose projects or otherwise) to displaced homemakers. Such training and supportive services, job counseling, job search, and job placement services; outreach and information services, including information on available educational opportunities; and referrals to health, financial management, legal, public assistance, and other appropriate supportive services in the community being served. To the maximum extent feasible, activities supported under this paragraph shall be coordinated with and supplement, but not supplant, activities supported under other titles of this Act and shall emphasize training and other employment related services for participants that are designed to enhance their employability and earnings. Programs shall concentrate on creating new jobs in the private sector for displaced homemakers in order to meet identified needs within the community. To the maximum extent feasible, supervisory, technical and administrative positions within the programs shall be filled by displaced homemakers. Priority for participation in projects supported under this paragraph shall be given to displaced homemakers who, as provided in regulations which the Secretary shall prescribe, are most in need of services by virtue of age, education, training, household support obligations and employability.**

The above is the end result of the federal displaced homemaker bill as it emerged from the legislative meat grinder attached to Title III of the CETA Act. To carry out these myriad tasks, the Department of Labor set aside $5 million for the entire country. Of these special funds, a total of $3.25 million will be allocated to regions to supplement funding of proposals submitted by prime sponsors for implementation in FY 1980.** In awarding grants, priority is to be given to primes who (1) allocate Title II and/or VI matching funds to support displaced homemaker programs and (2) include in their proposal program coordination arrangements with other funding sources which could be used to continue the program after expiration of the grant period (WIN, Vocational Education, etc. - See Linkages.)

In addition, $1 million is set aside for national demonstration programs to test and document the efficacy of various approaches to meeting the needs of the displaced homemaker target population. These grants will be awarded on a competitive basis by the Office on National Programs (ONP) of DOL. The remaining $750,000 is presumably earmarked for coordination, training and evaluation.

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*Comprehensive Employment and Training Act Amendments of 1978

**For allocation by region, see Vol. 44 Federal Register, No. 122, June 22, 1979.

WHO IS A DISPLACED HOMEMAKER?

According to CETA regulations, a displaced homemaker means an individual who:

> *(a) Has not worked in the work force for a substantial number of years but has, during those years, worked in the home providing unpaid services for family members; and*
>
> *(b) (1) Has been dependent on public assistance or on the income of another family member but is no longer supported by that income; or*
>
> *(2) Is receiving public assistance on account of dependent children in the home, especially where such assistance will soon be terminated; and*
>
> *(c) Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.**

Some of the sharpest conflicts have been, and will no doubt continue to be on the question of definition. Administrators may be interested in removing the maximum number of welfare recipients from AFDC roles whatever their age, while older women will continue to insist upon the original focus upon middle-aged and older women. ETA field memos have stated that, within the total eligible displaced homemaker population, priority should be given to those individuals who have been out of the labor force the longest and/or who are over 40. In the words of one ETA field memo, "The higher the age, the greater the priority attached, particularly for those who are 40 years of age and over who face the additional handicap of age discrimination...The more lengthy the absence, the greater the priority...Displaced homemakers with less work experience may have greater need for in-depth assistance."** Prime sponsors need to be reminded of this priority.

It remains to be seen in actual practice if enough of the key elements of the original legislation are retained to call it a viable program for middle-aged and older former homemakers. Loss of a clearly defined age focus would be the most difficult aspect to cope with, and would change the term coined for this constituency into a generic term applicable to any woman who has lost her husband.

Why would broadening the program dilute the value of CETA's displaced homemaker provisions? There are many competing pressures for CETA funding.

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* 20 CFR §675.4

** ETA Field Memorandum No. 334-79, 6/21/79 to Regional Administrators, Attachment II, pp 13 - 14.

At best, allocations will be small, and may well be fleeting. Unless this "seed money" is used to develop new methods for working with this constituency and to create new jobs for former homemakers who are "hard to employ" precisely because they are older women, the legislative effort may well have been in vain.

Moreover, to include all women who are widowed, divorced or separated would be to dilute services for younger women who also need real job assistance. It gives the false impression that the employment problems of both younger and older women are being adequately addressed through this single program. And it would be a terrible disappointment to many older women who have looked to the displaced homemaker legislation as a candle of hope to sustain them through agonizing personal circumstances.

ETA Regional Administrators have been requested to designate an individual as Displaced Homemaker Programs Coordinator in each of the 10 regions, who is expected to coordinate all displaced homemaker activities within the region. Additionally, Regional Administrators of the Women's Bureau, acting jointly with the national office, are expected to play a leading role in helping to implement displaced homemaker provisions in CETA.

On a non-governmental level, the DISPLACED HOMEMAKERS NETWORK* coordinates information and advocacy, publishes an informative newsletter, NETWORK NEWS and covers all developments. In addition, the Displaced Homemakers Network distributes a handbook comprised of materials from various centers, DISPLACED HOMEMAKERS: PROGRAM OPTIONS. Developed by the Older Women's League Educational Fund for the first National Training Conference in Baltimore, October, 1978, this "evolving guide" covers a gamut of practical matters encountered in setting up a displaced homemakers program.

As quickly as interest flares up, it can cool down into bureaucratic lethargy. Left to their own devices the agencies responsible for implementing programs for displaced homemakers will transform them into their own image, so that no appreciable change will be felt. The answer is grassroots advocacy. Innovative ideas and impetus will come primarily from people who are part of, or directly associated with, displaced homemakers themselves. They know what their constituency needs; they can come up with creative solutions which tap the self-help energies of the people affected; they have "hands on" experience with existing barriers, both subjective and objective.

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* Displaced Homemakers Network, Inc., c/o Business and Professional Women's Foundation, 2012 Massachusetts Ave. NW, Washington, D.C. 20036.

In the long run, of course, success will depend on local people pressing prime sponsors, tempting them with the Title III carrot of extra money, and, if that doesn't work, concentrating on Title II (where the big money is), working out connections with Vocational Education, WIN and other sources, and keeping at it until a program is started. The advocacy chapter discusses some techniques for naggers. But first we will consider another door to CETA funds.

THE OLDER WORKER

> *Ms. Kitchens: For many older Americans, employment means a foothold in the world, a further contribution to society. It means filling the void left by the departure of grown children or, perhaps, the death of a spouse. It means maintenance of a decent standard of living. The young take for granted each new day, but their parents and grandparents are often driven by a sense of urgency, a feeling of desperation in a society that says, "You are no longer needed." Re-entry into the job market offers freedom from fear - fear of financial pressures, fear of loneliness, fear of dependency, and fear of being shunted to some corner away from the mainstream of life, with resultant loss of dignity and self-esteem.*[*]

Testifying at a public hearing on employment of older persons, this elderly woman stated the problem. To what extent has it been addressed in the field of aging, and what is CETA's role? To maneuver within another whole bureaucratic system, a little background on employment and aging is in order.

OLDER AMERICANS ACT

Advocacy for older persons resulted in passage of the Older Americans Act in 1973, amended in 1978. As with CETA, it is divided into a number of titles covering federally funded programs to tackle the major problems of the elderly (60 and over). One such program is the Senior Community Service Employment Program (SCSEP),[**] administered by the Department of Labor but contracted to five national non-profit organizations[*], and since July, 1977, also to state agencies on aging. Generally enrollees (age 55+) receive part-time employment at minimum wage. Eligibility requirements are even tighter than CETA. The neglect of older persons by CETA, the inadequacy of state employment services for older persons, and the pervasive effects of age discrimination in both public and private sectors have all increased the pressure on OAA Title V to fill the gap. Although designed as a supplement, not a substitute, it is seen in many DOL quarters as older people's CETA. Besides all its other functions, OAA Title V is used to augment inadequately staffed service programs for the elderly and to improve the "seniors serving seniors" image. As stated by Director Janet Levy of the California Department of Aging, "While its value in providing part-time work experience and retraining should not be underestimated, by itself, the ability of (OAA Title V) to affect the severe employment problems faced by older people is really limited."[**]

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[*] Obstacles and Opportunities for Employment of Older Persons in California, California Commission on Aging, 1978. See Resources for how to obtain copy.

[**] Formerly Title IX, under 1978 revisions now Title V. To avoid confusion, this employment program will be referred to as OAA, Title V.

In some ways, the existence of this program has dulled advocacy for a fair share in CETA, or even for any age-based affirmative action within other Older American programs. The major national advocacy organizations of aging, who vigorously promoted the OAA including its employment title, are the main beneficiaries of Senior Community Service Employment, their operating budgets reinforced by administrative costs of the program. In the past few years, the major thrust by the aging establishment on the issue of employment has been anti-mandatory retirement legislation (extension of the Age Discrimination in Employment Act to age 70), rather than CETA and other government funded employment services or affirmative action for older persons.

The Older Americans Act also sets up a whole administration on aging, the major parts of which are:

- -- Administration on Aging, the Washington based agency headed by the Commissioner on Aging, responsible for the OAA funds, planning, model projects, research, evaluation and coordination.
- -- Regional Program Offices, corresponding to the 10 federal regions.
- -- State agencies on aging, usually funded both by federal and state monies, responsible for all the above functions on a state level.

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[*] National contractors for SCSEP programs: American Association of Retired Persons (AARP), National Council on the Aging (NCOA), National Council of Senior Citizens (NCSC), Green Thumb, U.S. Forest Service.

[**] Obstacles and Opportunities for Employment of Older Persons in California, Calif. Commission on Aging, 1978, p 26. See Resources.

-- Area Agencies on Aging (triple A's), the local administrators of OAA programs, also responsible for information and referral, planning and coordination.

-- Deliverers of services, such as nutrition programs. These may be CBO's or businesses, who contract with AAA's.

Presumably, everyone advocates for the elderly, but the official organizations with this responsibility are:

-- The Federal Council on Aging, advisory to the Commissioner on Aging.

-- State advisory bodies representing "consumers of services" and the public interest, sometimes called commissions on aging.

-- Advisory councils to the Area Agencies, usually made up primarily of more active seniors, many very knowledgeable about aging programs. Sometimes this is an effective advocacy group; sometimes it is a rubber stamp for an administrator.

Again, it is important to know the key players when attempting to join the game. In working on a local level, the Area Agency staff and advisory body are key, but sometimes there are specialized advocacy groups, such as an employment program or an active local group like the Gray Panthers that can help get things moving.

What is the older woman's stake in all this? The image of "older worker" is male -- a man who has worked at one job, but due to age, physical slow-down, obsolescence of skills or lay-offs, has lost his job and has not been able to replace it. But there is much evidence, although no reliable figures because of inadequate unemployment statistics, that the majority of older persons wanting work and not finding it are female. For example, about two-thirds of OAA Title V enrollees are women. Therefore, women should scan "older worker" provisions in the new CETA for handles for advocacy. With their initiative, the organizations and agencies dealing with aging may become the catalysts for action.

THE OLDER WORKER AND CETA

The old CETA virtually ignored job needs of persons 55+. In addition to considering OAA Title V a substitute, mandatory retirement, earnings limitations under Social Security, age cut-offs in apprenticeship, insurance and pension costs were compounding excuses for not addressing the employment problems of a segment of the population which was suffering terms of unemployment equal to Black teenagers.*

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*Marc Rosenblum, The Older Worker: The Recession's Continuing Victim, Senate Special Committee on Aging.

However, there was a shift of interest in the 95th Congress, due partly to highly successful efforts led by Rep. Claude Pepper, Chair of the House Select Committee on Aging, to eliminate mandatory retirement in the public sector and to extend to age 70 protection of the Age Discrimination in Employment Act (ADEA) in private employment. Demographic shifts in the population raised the fear of a shrinking workforce supporting an ever growing number of retired people. For these reasons, plus the U. S. Commission on Civil Rights Age Discrimination Study, the issue of employment of older persons was brought to the forefront. Even the CETA reauthorization bill was affected.

POSSIBILITIES UNDER THE NEW CETA: TITLE II

> *1. Activities and services for older workers shall be designed to assist them in overcoming the particular barriers to employment experienced by older workers, including: skills that are obsolete or no longer needed in the community; physical characteristics associated with aging; employer reluctance to hire older workers; financial barriers to labor force participation; and the lack of appropriate job opportunities, including job opportunities offering alternative working arrangements (sec. 215 (a))*
>
> *2, Prime sponsors shall use activities described in Section 308 (Title 111) of the Act (projects for Middle-Aged and Older Workers) and coordinate activities under this Part with programs and services provided by senior centers, area agencies on aging, and State agencies on aging...**

The above is spelled out under "Training Activities for the Economically Disadvantaged". Older workers are also included wherever there is a laundry list of disadvantaged groups to be served. But remember, priorities and choice of programs is left in large measure to the discretion of local communities. While "prime sponsors may design program and services to assist specific target groups" (676.54 b), justification is required for service "at a level more or less than the incidence of persons in that significant segment in the total eligible population". In other words, if there is little or no service for older workers, as has been the case in the past, the prime can be brought to task, but the job of doing so will fall on the community, not the DOL.

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*CETA Regulations, 20 CFR §677.13(d)

TITLE III, A FOOT IN THE DOOR

Section 308 under this title is in many ways a model employment bill for older Americans. Unfortunately no funds have been allocated to implement its provisions, and no guidelines have been issued by the DOL. Instead, the primes are told to use its provisions to devise programs for older workers and to coordinate these activities with state and local aging offices (see above). The buck has been passed to the locals.

What are the main features of Section 308?

-- a more equitable share of employment and training resources for middle-aged and older workers.

-- programs to facilitate transition of workers over 55 from one occupation to another, and from non-participation (discouraged workers and older women new to workforce) to participation -- including work experience, vocational education, public service employment, on-the-job training, occupational upgrading, job search and placement.

-- technical assistance to employers to establish flexi-time, job sharing and other innovative arrangements suited to the needs of older workers.

-- research on the relationship between age and employment, including wide distribution of results to employers, so that they can better utilize capabilities of middle-aged and older workers.

-- programs to develop methods to assure increased labor force participation for older persons unable to secure employment or discouraged from seeking it.

To carry out the above, the Secretary of Labor is mandated to make "appropriate arrangements...with prime sponsors, members of the business community (including small business), labor organizations, local educational agencies, and community-based organizations". Such arrangements are spelled out as follows:

-- analysis of the local labor force (by age, education, income, race and sex) for comparisons of unemployment and underemployment among various demographic groups. (This could be especially helpful to older women.)

-- assessment of skills and work experiences to formulate realistic second career objectives, as well as counseling services by persons knowledgeable about older workers, and formal second careers training agreements between participants and program sponsors.

The secretary is authorized to pay program sponsors reasonable training costs to include: tuition, payments to program sponsors, equipment, materials and other needed costs. Participation in such programs may be on a part-time or flexi-time basis. Although "older worker" is elsewhere defined as 55+, participants in programs authorized under this section are defined as persons 40+, who are unemployed, underemployed, or economically disadvantaged, who have a family income not in excess of 125% of the OMB poverty level. Further, "The Secretary shall reserve from funds available for this title not more than 5 percent of the amount available for this title. No provision of this section shall be construed as intending any diminution of the employment and training opportunities available to workers over forty years of age under Titles II, VI and VII of this Act".

If that 5% of Title III funds were used to trigger this significant piece of legislation, it could mean a turn-around for older people and employment. Women have much at stake to make that happen. The CETA beast appears to be dragging its heels on this one.

RATIONALES FOR EXCLUSION

Consciousness raising with local CETA personnel is definitely in order. Here are some of the common rationales preventing older women from receiving their fair share of CETA services:

Training of older persons, and especially older women, is not cost effective.

As this line of thinking goes, why spend money from a limited budget for persons with fewer years to be productive? One could argue just as well from the opposite viewpoint: why not reward those who have already proven their productivity by raising families and/or serving in the workforce? In fact, high nationwide placement goals have been set for veterans under the rationale that they have served their country and have earned this training. With the postponement of mandatory retirement to age 70, and in some states its elimination, the cost effectiveness rationale has been weakened. Middle years women, especially, have many productive years to go, and employment is far more cost effective than the price of public dependency.

Older people don't want/need jobs.

Older people, like other ages, are a mixed group. Some with resources to enjoy it, welcome early retirement; others would like suitable employment if they could find it; still others (especially older women) are trying to break into the labor force after years in the home. Many are really desperate for work. Until adequate programs are offered and some viable job options for older women are available, there is no reliable way of knowing how many want jobs. As the 1975 Harris survey revealed, women in the 55-64 age bracket reported themselves unemployed almost five times as often as official figures.*

Older people are already taken care of. They have the Senior Community Service Employment Program, funded by the Older Americans Act.

As stated earlier, the SCSEP should not be seen as a substitute for CETA but as a supplement. Compared with CETA it is a minuscule program -- less than .05% of the Manpower (sic) budget. It is a separate and very unequal job program, and this and other rationales should be sharply challenged as the ageist excuses they are.

WHAT CAN WE DO?

The new language related to aging in the CETA reauthorization, and the specific references to linkages with state agencies on aging and area agencies provide a brand new ball game. Older women interested in job related services must bring CETA together with the aging establishment even if it means a shotgun marriage. The time is ripe for local consciousness raising to make Section 308 a reality.

Specifically how? Again, as with CETA, start with an interested staffer in the Area Agency on Aging (AAA)**, someone with imagination who understands that paid employment should be distinguished from volunteer work. Brainstorm how any existing senior employment services could be tied in with CETA. For example, if the AAA has Senior Service Employment slots assigned to it, could these be designated as Employment Advocates, to provide ongoing liaison with CETA, state employment and aging offices? Point out that it would be much better to compound the effectiveness of these inadequate resources by using them to develop access to already existing public employment services supposedly available to all, than by using these enrollees merely as aides in other senior programs. Or develop one of the proposals described as "blue sky" in Chapter IV, many of which are related to aging.

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* MYTH AND REALITY OF AGING IN AMERICA. Louis Harris & Associates. NCOA, Washington, D.C. 1975.

** These go by various names: Commission on Aging; Aging Department, etc.

Warning: since aging offices are always short of staff to provide their many mandated services, they often look to CETA for public service slots to augment their limited personnel. Unfortunately, this trend reinforces the "caretaker mentality" which views older persons not as providers but as recipients of services. AAA's have often been content to lobby for PSE slots, fostering dependency of elders while providing employment for younger professionals in aging. Here again, consciousness raising may be in order.

STALKING THE ELUSIVE CETA PRIME

III. THE PROPOSAL PROCESS

What is a proposal (besides a colossal headache)? It is a working plan for subcontracting tasks for which the contracting agency is responsible. If a prime sponsor has stated in its plan that it will train and place a specific number of persons for selected significant segments and has accepted money under various titles from the Department of Labor for doing so, it now turns to "providers of services" to get the job done. Congress has "oversight" on the DOL to see that its intent is carried out; the DOL, through its Employment and Training Agency, passes the responsibility down to the prime sponsors and states; they pass much of it along to subcontractors. All are concerned for their own jobs and must see that the government is getting its money's worth. A good part of the inflexibility and red tape is a consequence of trying to avoid being fleeced.

Persons who submit proposals are essentially salespersons. The prime (or state CETA office or Office of National Programs) generally controls the procedures and makes the decisions on who is to be funded and who is not. So to get funded it is essential to adhere to their rules and play the game according to their dictates. But while the beast appears to be in complete control, there is considerable room to maneuver and many political ways to influence decisions.

There are three basic steps in the proposal process:

1. researching the proposal
2. creating a marketable proposal
3. building a constituency and "politicking" a proposal

1. Researching the proposal: There are many things to be learned before a successful proposal can be written. The first area to research is your own proposed project -- being prepared to state clearly the needs you wish to address, the objectives you have in mind that are quantifiable and the program design you feel will work best. The second relates to research into your prime sponsor's other contractors. What kinds of contracts have been accepted in the past? What kind of monies have been spent on what activities? Who are the constituencies behind their agencies? How was their performance measured? What did their budgets look like? The annual and master plans of each prime sponsor contain information on contractors who provide services. Do some research with

former recipients to learn the ropes.

The third research area relates to the CETA personalities involved. Who have other contractors found helpful? Who has the clout? Who is responsible for putting together the annual plan? Who is in charge of public service employment, classroom training, on-the-job training? Make the personal contact with CETA staffers. Find out the restrictions they are working with. Ask what makes a strong proposal. Talk through _your_ ideas. All this research activity lays the groundwork for the proposal. Once you have cased the situation, you know how to write the proposal. A word of caution however -- don't let "no's" along the way stop your progress. If the personnel in one part of the CETA office is not supportive, seek more supportive staffers in another part of the system. Go around blockades.

2. _Creating a marketable proposal_. Once proper research is done, you will know how your proposal should be written. Are you looking for Public Service Employment slots? Do you need a "purchase of service" contract to provide training, workshops, counseling services, job placement? Will you serve as an OJT site or as a "work experience" site? How will your participants be identified as CETA-eligible? How will they be recruited? Will you provide allowances for supportive services, like transportation or emergency services? How do you propose to assess your participants' skills and occupational interests? How will you follow up on each participant? How will you define and document termination? How will your performance be evaluated? Are you willing to accept a "performance based contract", which demands that your participants reach particular prearranged skill levels before you are paid for your services? (_It is not necessary_ in most cases.) Your proposal must answer these and many other questions. You must, for example, be able to statistically verify that there is a need for the service to be offered.*

Look at the budgets accumulated in your research. Your budget must be constructed to meet what are called "allowable expenses" under CETA. Your "administrative costs" must be at a level acceptable to your locale, which you will know from contracts previously funded. Writing a marketable proposal essentially means effectively addressing all of the issues the prime sponsor must

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* See Chapter V, "The Data Game" for more on "needs assessments".

address in its master and annual plan. Such a proposal will have activities with quantifiable employment-related results, meet the requirements of the regulations of the title for which you are applying, provide documentation of results, and will not clash headlong with the general CETA system. If it is an innovative concept, will impact upon one of CETA's "significant segments" or could bring good publicity, it will be all the more marketable. And if your proposal comes backed by a strong constituency, your chances are even better.

3. Building a constituency and politicking a proposal.

- Find strong sources of support, the closer to government the better. Support from a county commissioner or city council member will usually help (unless such member is isolated politically). Letters of support from commissions on the status of women or aging, from state or local departments on aging or from planners are all useful.
- Invite an executive of CETA or politician who sits on the policy board to a meeting on what CETA is doing for displaced homemakers and/or older workers. Arrange media coverage. This may be a community meeting including a number of persons directly affected, a monitoring group such as the League of Women Voters, or a combination of community groups.
- Consciousness can be raised at public meetings of the CETA advisory council by a well prepared presentation. (Prime sponsors attempt to cover all bases and are threatened by an organized, articulate group not being served. As politicians, they want no organized segment of the population to leave their banquet table hungry.)
- CETA primes are as susceptible to media influence as anyone else. Prior to decision making, place stories about the problem or program in local papers or in TV interviews. In most areas there are supportive media persons to provide further ideas on raising the issue in public consciousness.
- Work with community advocates and a friendly insider to sharpen the sensitivity of apathetic primes. For example, a representative from a state or local Commission on the Status of Women or League of Women Voters could query the prime sponsor on programs for displaced homemakers currently funded or planned. In so doing, ask enough specific questions to stimulate staff research. Keep in touch with the friendly insider to determine the

impact of the tactic, and follow-up with a request to make a brief presentation on the problem to the policy or advisory body. When questions and comments come from varied sources, even the most disinterested staffer will begin to move, if only to protect his/her own job. Ask for something in writing for a newsletter, to stimulate staff research. The more ways in which both staff and policy makers see that older women are organizing and expecting fair share of services the better the chance of being included in funding.

- When a proposal goes to the decision making council, stack the room with your constituency, as visibly as possible. These persons are not only clients requesting help, they are voters.

LINKAGES

"Maximum coordination" is written into the purpose of the Act. From CETA's viewpoint, establishing linkages helps cut down on duplication of services, means more resources for the same number of CETA dollars and is politically desirable. From the deliverer of services' point of view, linkages can mean a proposal is more likely to be funded, make it possible to provide multiple services for clients, build bridges into the community for potential jobs and services, and help to construct a power base.

Furthermore, linkages are part of the regs. Prime sponsors must use "appropriate services" already available in the community, e.g. state employment services, VocEd, labor organizations.* Primes are also directed to link up with local educational institutions.**

When developing a proposal, linkages sometimes make it possible to collaborate or to piggyback one project on another. If a CBO is applying for funds, CETA will want to know how much support it has in the community and whether it will dovetail its services with others. This information is usually provided in letters of support or memoranda of understanding. Linkages should be of interest to monitors as well. Is the prime sponsor linking itself to agencies which effectively screen out older women? If so, suggest alternative ones or propose a special program to meet their needs.

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* 20 CFR §676.23(d,e,f,)

** 20 CFR §677.3

Types of Linkage:

Educational institutions. There are so many of them it creates a morass of confusion in the search for linkages, but in general, it is best to go where the innovation is. All vocationally oriented educational institutions are called Local Education Agencies (LEA's), such as boards of education, city schools, community colleges and Voc-Tech schools. Sometimes CBO's can develop collaborative projects with LEA's. For example, the CBO might be responsible for outreach, recruiting, screening and perhaps case management and support services, while LEA staff would orient participants to vocational education options within the LEA's jurisdiction or provide vocational training.

Community organizations. Support from community groups is very helpful when politicking a proposal, especially those with large or influential membership because these groups represent voters. Persons within educational institutions developing programs for displaced homemakers should be collaborating with such organizations as the League of Women Voters, commissions on the status of women, related CBO service deliverers, such as YWCA's, church organizations of women, Business and Professional Women (BPW), National Organization for Women (NOW), and any other active groups in the community. Besides support during the funding process, these organizations can be included on a continuing basis through participation on boards and advisory bodies or may become co-sponsors of specific projects.

Aging network. The first step here is encouragement of a memorandum of understanding between the Area Agency for Aging and CETA. Exchange of AAA/CETA liaison persons to attend mutual advisory council meetings will further the linkage. Other steps might include: joint sponsorship of a conference on employment and the older worker; provision by AAA/CETA of technical assistance to non-profit agencies interested in developing older worker programs or joint activities through the Private Industry Council.

Handicapped. This is a constituency which is becoming increasingly vocal and advocacy minded. As a result of advocacy, particular concern for the handicapped is written into a number of the CETA regs.* A large proportion of this population consists of older women, but vocational education has usually favored training of younger handicapped persons on the assumption of "more years to justify the expenditure". Linkages with local organizations of the handicapped may be needed to overcome this age bias. A national survey prepared in 1978, "Coordination of Employment Services for Handicappers"* spells out programs funded last year.

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* §§676.10-4(c)(1)(i) and (h)(4), 676.11(c)(3) and (5), 676.52(a) and (d), 676.53(a) among others.

The question of linkages is so complex that a whole other manual could be written about it, but in essence it means: find out who else in the community has potential interest in job needs of older women; explore areas for collaboration; work out a plan and put it in writing.

FUNDING FROM MORE THAN ONE SOURCE

Suppose you had a grant from state or educational sources for a displaced homemaker or older worker program which carried no restrictive eligibility, such as required by CETA. But you are also awarded a contract to train "x" number of CETA eligibles. As long as you keep your records and bookkeeping very carefully distinct, you can serve both CETA eligibles and ineligibles together. You will charge prorated amounts to each contract. This makes it possible to serve all those in need, whether they fit arbitrary CETA restrictions or not. This is called parallel proposal writing, because you are providing similar services to more than one type of participant, funded from different sources.

Seeking funding from multiple sources is both frustrating and time consuming, because the same three steps of research, marketing and politicking the proposal are necessary. But each bureaucracy has its own behavior patterns, so what works with one, does not necessarily apply to another. However, with experience, it does get easier. Before long, a proposal writer will probably be wheeling and dealing in a way she would never have anticipated.

The Career Planning Center in Los Angeles** is an example of a community based women's organization which has successfully mastered the multi-funding approach. The Center is currently administrating eight CETA projects, one state employment service (EDD) grant, one state vocational education program and one Law Enforcement Assistance Act (LEAA) project. Four of these involve older women.

The advantages of multiple proposals are: it makes it possible for the agency to offer more options to women participants under one roof; jobs are created for staffing the projects; small contracts which would not be economically viable on their own may be grafted on to a central core, reducing administrative costs; and over a period of years a program can become an authentic multipurpose center. Disadvantages are increased administrative hassles, more time-consuming proposal writing, and danger of losing the grassroots while trying to conform to bureaucracy. The Center in its different programs, provides services to women of various ages making it possible to involve a displaced homemaker in one project, her teenage daughter in another. A computerized basic learning process developed for one educationally disadvantaged target group, will be expanded and modified at little cost for older women who need the basics. Handling multiple proposals is a juggling act, but it is one of the few ways to bring it all together and survive, especially in a large urban community.

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* "Coordination of Employment Services for Handicappers (Nationwide Survey)" Michigan Dept. of Labor, 1978. See Resource list. Contains many program ideas applicable to persons "handicapped" by age as well.

** Career Planning Center, 1623 So. LaCienega Blvd., Los Angeles, CA 90035

Finding other sources of funding outside CETA is another area for research. Here are some of the laws, and/or agencies which have or might fund job related programs for older women:

Vocational Education Amendments*

Under these 1976 amendments, federal funds are allocated on a formula grant basis through approved state voc ed plans. States must use some funds to provide programs for Displaced Homemakers, single heads of households, homemakers seeking employment, part-time workers seeking full-time jobs and persons seeking non-traditional jobs. Although these programs are mandatory, the level of funding is left to the state's discretion.

Programs for Displaced Homemakers are provided by LEAs, such as community colleges and state vocational schools. They may also be provided by CBOs and public and private non-profit agencies on a collaborative subcontract basis. Services which may be offered include courses or programs on how to seek employment, placement services for graduates of voc ed programs, and preparatory courses for employment.

In addition, grants can be made under this Act to public and non-profit organizations, institutions and agencies and individuals for research and development of nationally significant model programs. These projects may concern the elimination of sex bias and sex stereotyping in curriculum, counseling and teacher attitudes and behavior.

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* 20 U.S.C. §§2330 et seq. See Resources for Women's Bureau Guide to Coordinating CETA/VocEd Legislation.

Womens Educational Equity Act*

This Act makes grants available to public agencies, private non-profit institutions, and individuals to advance the goal of educational equality for women. Intended to complement Title IX of the Educational Amendments of 1972, which prohibits discrimination in employment and educational programs and activities in educational institutions, the WEEA addresses all levels of education and permits a wide variety of activities to be funded. Past model programs have concerned sex-fair counseling and program materials, training, monitoring of sex discrimination policies, and developing materials to assist institutions and agencies in complying with Title IX.

The first $15 million appropriated under this Act is for projects of national significance, and for the dissemination of information and project materials related to achieving educational equity. 75% of the local funding (that is, funding above the first $15 million) is reserved for helping LEAs to provide educational equity. Small grants of up to $25,000 each are also authorized to support innovative approaches.

Career Education Incentive Act**

The purpose of the CEIA is to increase the emphasis placed on career awareness, exploration, decisionmaking, and planning, and to do so in a manner which will promote equal opportunity in making career choices through the elimination of bias and stereotyping on account of race, sex, age, economic status, or handicap.

Five percent of the annual appropriations under the Act are set aside for grants directly to SEAs, LEAs, postsecondary educational institutions, and other nonprofit agencies and organizations for model programs, particularly projects designed to eliminate bias and stereotyping on account of race, sex, age, economic status, or handicap.

In addition, demonstration projects may be arranged by way of grant, contract or other arrangement with institutions of higher education, public agencies and nonprofit private organizations to promote secondary career guidance and counseling programs, particularly those designed to overcome bias and stereotyping on account of race, sex, age, economic status or handicap.***

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* 20 U.S.C. §§3341 et seq.

**20 U.S.C. §§1865, 2502, 2601-14

***No money had been appropriated for this as of September, 1979

*The Economic Opportunities Amendment of 1978** , administered by the Community Services Administration, is similar to CETA. It authorizes experimental employment and training programs for the unemployed and underemployed, with special emphasis on single heads of households with children and older workers. This Act is subject to the specifications set forth in CETA.

*The Targeted Jobs Tax Credit*** is a law which permits employers to receive a tax credit of up to $3,000 for each economically disadvantaged person they hire for certain categories, including AFDC and SSI recipients and handicapped persons.

Law Enforcement Assistance Act.***

One purpose of this act is improvement of law enforcement and criminal justice. Fifteen percent of funding for these issues is set aside for grants to state planning agencies, units of local government or private, non-profit agencies. An additional purpose is development of methods for prevention and reduction of crime, and for detection, apprehension and rehabilitation of criminals. A National Institute of Law Enforcement and Criminal Justice was established within the Dept. of Justice to encourage these aims. The Institute is authorized to make grants and to enter into contracts with public agencies, institutions of higher education or private organizations to conduct research demonstrations or special projects.

Comprehensive Older Americans Act, 1978 Amendments. (P.L. 95-478)****

Area agencies and state agencies for aging assume new responsibilities for planning and managing a myriad of social services to persons 60+. Significant increases in funding levels of programs for the elderly appear to be assured for the coming year. Also, Senior Community Service Employment slots (for low-income persons 55+) have been substantially increased for state and area agencies. These *could* be used for employment advocacy or for projects suggested in the next chapter, in collaboration with CETA.

Other Sources for Collaboration

One agency worth investigating for collaborative projects, in part because it is within the Department of Labor and the regs mandate coordination, is the Work Incentive Program (WIN), which is primarily concerned with moving persons off the AFDC roles. While there are many criticisms of the WIN program, and its participants are largely younger women, the older woman who is about to lose her benefits because her youngest child is approaching 18 could be a special target group for an innovative program.

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* 42 U.S.C. §2809(a)(7)

**The Targeted Jobs Tax Credit, 26 U.S.C. §51,52,53. Note: S.B. 464 and H.R. 3005, Currently in the legislative hopper, would amend the list of targeted groups to add displaced homemaker.

***42 U.S.C. §§3711 *et seq*.

****42 U.S.C. §§3001 et seq.

A small but receptive agency is ACTION* . Like all federal programs, it has national projects and local ones implemented through regional offices. Since the focus of ACTION is volunteerism, any project which uses volunteers in substantial numbers might investigate this source. ACTION's funding is very limited, however.

INSIDE CETA: THE GOVERNOR'S SPECIAL GRANT PROGRAM

Another source of funding within CETA itself, very important to older women, is the so-called Governor's 4%,** which includes demonstration and model training programs and related services, and can be a source of funding for innovative projects. The governor must submit a master plan and annual plan similar to those of the prime sponsor, and a Quarterly Summary of Participant Characteristics. These should be available from the state CETA office. The advisory body on the state level is called the State Employment and Training Council. To get a fix on this valuable source of funding, contact staff in the state CETA office.

Example: In 1978, the North Carolina Senior Citizens Federation developed a "Senior CETA Educational Project", funded by the governor's 4%. It was designed to employ retired teachers to train 120 poverty-level black and white elderly in fundamental skills related to the three "R"'s. The pension benefits these teachers received could not be counted as income. This successful program has now spun off to ten other community colleges, which are underwriting costs of instructors and instructional supplies.*** Among other values of the project, it demonstrated the worth of retired citizens as teachers and students.

State goverments play an important role in distribution of federal funds, as in the Governor's 4%. State bureaucracies also administer federally supported and assisted programs such as Employment Services, Vocational Rehabilitation, Social Services (known as Title XX), Vocational Education, public health, Work Incentive program and balance of state CETA. In some instances state agencies carry out the programs; in others they serve a middleman function in allocating funds to local agencies. So input is needed wherever a contact can be made. As far as older women are concerned, consciousness raising is the order of the day.

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* ACTION, 806 Connecticut Ave., Washington, DC

** 20 CFR §677, Subpart D

***"North Carolina Senior Citizens Federation, Inc.: An Historical Perspective" by Andrea Harris. Journal of Minority Aging, Aug. 1978 - June 1979, p 178

STATE AND PRIVATE FUNDING

Federal dollars are not the only resources available. Many states have passed displaced homemaker bills, or have other state supported social service programs which might be applicable to older women. Try these for collaborative projects. A friendly state legislator or someone in the governor's office could help you ferret out small pockets of money for innovative projects.

Foundation money usually has the advantage of fewer strings attached, but is hard to come by, especially now when public funds are drying up. However, private funds are a good source of seed money to get a non-profit organization going while accumulating the track record to tackle CETA. Also, loans may be needed for "up front money" while waiting for a contract to be fulfilled. Some foundations help out on this.

In other words, pick the mint leaves wherever you can find them.

MORE PROPOSAL TIPS FROM THOSE WHO HAVE LEARNED THE HARD WAY

- Start early. Six months before RFP's is not too soon. Get on the prime's mailing list(s) specific to your interests.
- Assume cooperation. YOU can help the prime's staff perform its tasks. Determine who on the local planning staff deals with women's and/or older person's issues.
- Discuss: general directions of the department; time and meeting place of the decision making body (CETA Council) and advisory body; significant segments and percentages and timetables. Try to develop a mutually supportive and warm relationship. Ask for all relevant materials including previous RFP's plans and reports.
- Find out who will be the staff persons responsible for developing the relevant RFP. It may be possible to become a consultant to the prime sponsor and to influence the RFP.
- There are two kinds of bureaucrats: those who want minimum work and those who want to make a contribution. Decide which you are dealing with. With the former, present a finished product for an O.K.; for the latter, provide options to choose from.

- In seeking information, ask "Where can I find the answer?" rather than the question itself. Bureaucrats, like other people, would prefer you did your own basic digging. You can return for qualifications, limitations, and fine points.
- Bureaucracies, whether on a national, state or local prime sponsor level, are not good breeding grounds for innovative ideas - not because there are not clever people in them but because they are working under contradictory pressures, harried from all sides, and risk taking is rarely rewarded. But inside the breast of many a bureaucrat there beats a heart that cares. And everyone has a mother. Your task is to present the project in such a way that it is worth taking risks for.
- If you have an innovative project, you need a better bureaucrat to work with who is willing to take risks. Innovative stuff is not usually considered meat and potatoes but frosting on the cake. So write in leeway into your budget so you won't be caught short. A good sponsor will respect that.
- Check the time schedules, which are usually rigid. RFP's are made public much too late to do anything more than fill out the forms and finalize the proposal and budget, which is one reason why so many poorly conceived projects are funded. A quality job must be ready to go.
- Attend any offered technical assistance workshops, ask questions freely and listen for their language and mindset.
- CETA staff are usually overworked public employees, so be considerate of their time. If they become hostile, the project will suffer.
- Make sure that the proposal conforms in all aspects to the guidelines, as presented in their format,and that budget categories are those requested, with the total amount in the right ball park.
- After submission, attend every meeting open to the public, and look for any materials which indicate progress, such as preliminary recommendations of staff to the advisory council. This is a period of frantic politicking of all concerned.
- Anticipate the oral interview of finalists. Be prepared, not only on matters directly related to the proposed project, but on the attitudes of those who will be presenting the questions. Assess the prejudices of both staff and council members. The presentation should be attention-getting and brief. All questions, even prejudiced or irrelevant ones, should be answered courteously.

All this may be enough to intimidate even the stoutest heart. But mastering the proposal process is a skill that can be learned. An applicant who is not discouraged by the first rejection, but doggedly uses that failure to prepare better for the next time around, is going to make it. The applicant who begins to work for the coming year as soon as a contract is signed -- investigating spin-offs and multiple proposals -- is going to survive. And in so doing will make a valuable contribution to older women everywhere and teach CETA a thing or two.

IV. BLUE SKY PROPOSALS, OR MAKING A BEAUTY OF THE BEAST

A good proposal should look beyond the present gloomy job prospects for older women to bluer skies ahead. Rather than follow the pack down deadend pathways, brainstorm imaginative new jobs and/or training ideas. Innovative programs have several advantages. They are likely to have media value and so can catch public attention, which in turn means good politics for the primes. Moreover, pioneering projects often generate enthusiasm and deep commitment by the participants which help ensure success. But most important, they can lay the groundwork for broader changes up ahead, because they are directed more at job creation than helping individual women compete in a shrinking job market. Blue sky proposals are banners which proclaim, "Look, it can be done, and with a little help we'll make it happen".

But pioneering is not without its hazards. Training for jobs which don't yet exist is risky for the participants and puts strain upon the program provider who must usually break hard new ground. If immediate success rates must be met, a track record for future funding may be in jeopardy. Nevertheless, if older women are to make some breakthroughs, they must take risks and, like every other disadvantaged group, be willing to fight through until success.

For those interested in pursuing this adventurous direction, brainstorming is a useful technique. The purpose is to withhold evaluation until the maximum number of ideas has been generated, thereby separating imagination from judgment. Let imaginations soar because it is far easier to tame an idea down than to think one up. Encourage each participant to hitchhike on ideas of others and create an atmosphere which encourages spontaneity.

To stimulate such discussions, here are twenty principles for job creation with a programmatic example for each:

1. *Catch the headlines and "cherche´ la federal dollar"*.

In the introduction, we described a "blue sky" proposal for home conservation specialist to collect ideas and disseminate information on energy conservation. Considering the national attention on the issue, and proposed legislation to fund energy conservation projects, this idea is not impractical. Why not get a jump on the new jobs that surely will be created, by tying it into CETA training?

Strengths: media would love it; local politicians would see its advantages from their own interests; in itself it could make an important social contribution; the women involved would develop many skills and a great deal of confidence; it just might be a forerunner of a national program with a grassroots base.

Pitfalls: no immediate visible jobs at the end of the program (unless it escalated); an idea easy to "co-opt" by politicians for other constituencies.

Type of proposal: a joint OJT proposal with a private or public utility, or a Governor's 4%.

2. *The government can't do it all; design bootstraps for self-reliance and mutual help.*

As public funding shrinks for service projects in the community (especially for poor and elderly), local residents will become more interested in mutual aid projects. Out of necessity, self-reliance potential will grow and can be fostered by trained community organizers. Older women with extensive volunteer experience in community work are excellent prospects for such job creation. The Mutual Aid Project (MAP) of New York City* has pioneered in developing such self-help projects and training materials for this purpose.

To make such a project work, there must be recognition by the prime of hardships caused by reduction of services and some commitment to developing alternatives. When training is completed, paid staff will be needed to mobilize neighborhood resources and volunteer leadership, to lick the inevitable problems of red tape and funding. Some typical mutual aid projects crying to be organized: services to the homebound; consumer education projects; food buying and distribution clubs; community vegetable gardens; minor repair co-op, etc. Mutual aid projects are good for a community with a politically effective aging network.

Strengths: an adjustment to limited service budgets, it could also develop the activist base for maintaining needed services; people are empowered by mutual help projects, and community organizing helps build political clout. The women involved will learn varied skills. Politicians could be convinced of the cost-effectiveness of the mutual aid approach.

Pitfalls: Jobs at the end of the line are uncertain; it could be used as an excuse to further reduce services.

**Mutual Aid Project for Older People. 17 Murray St., 4th floor, New York, NY 10007

Type of proposal: Joint proposal with AAA, utilizing CETA, Title II classroom training funds and/or OJT.

3. *Hit a flock of birds with one stone.*

Suppose a woman's center is providing a wide variety of services and activities for older women, but is very short handed and desperately needs additional staff to grow. Design a project with emphasis on transferable skills to other existing employment. Persons accepted are groomed for jobs in the private sector which have been solicited in advance. ("We will select a capable older woman, make her job ready, give her training in our own agency, take care of all the CETA red tape, if you will consider hiring her when she is ready"). Then utilize limited staff to supervise CETA trainees moving through a revolving door, providing support, instruction and TLC as needed.

Strengths: The center staff becomes the conveyor belt to the outside workforce, while extending varied services to other women; this type of project fits into the private sector bias of CETA. Women who move into industry can help open up additional jobs through the "old girl's network".

Pitfalls: Work at the center must be understood as temporary, to avoid "nesting"; regular staff will have a heavy burden; women selected must have expectation of success.

Type of proposal: Title VII, through PIC or PSE.

4. *Try out new ways to work.*

Example: The new CETA regulations specifically mention job sharing[*], thereby opening the door to some innovative experiments along this line. In fact, one organization, NEW WAYS TO WORK[**], has already pioneered the field, in part funded by CETA. Utilizing their extensive experience in job sharing techniques, consider developing a similar project on the local level.

Strengths: Part-time employment has strong appeal to many older women; there is good potential for intergenerational job sharing; advantages for employers have already been documented; helps develop more flexibility in the workplace.

Pitfalls: There may be union resistance; considerable consciousness raising may be necessary with the prime sponsor and spadework with employers. Fringe benefits have to be insisted on.

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[*] 20 CFR §§675.6(e) and 677.13(b)(6)

[**] NEW WAYS TO WORK, 457 Kingsley Avenue, Palo Alto, CA 94301. (415) 321-9675. A national job sharing network is currently in formation. Contact above address for information.

Type of proposal: PSE, Governor's 4% or work experience.

5. *If yobs are scarce, role your own.*

The older woman who has managed a home and family and perhaps helped her husband in his work is a possible candidate for self-employment, but may need help in putting it together. Function of the project would be to draw in technical assistance from the private sector as well as government agencies such as the Small Business Asministration. CETA job slots might be included for coordination and support staffing. Creative energy should go into translating past unpaid experience into "doable" self-employment projects, including partnerships and co-ops. Some possibilities; A project modeled on junior achievement for older persons, calling on the business community for assistance; a talent bank; consulting firm on older workers (every disadvantaged group has its specialists); a modeling agency for older women (but only in a large metropolitan setting).

Strengths: Self-employment can release energies and talents, and in the long run provide a satisfying career for the few who make it.

Pitfalls: Risky for both participants and sponsor. Takes a particular type of woman with great energy and drive.

Type of proposal: Title VII, through PIC.

6. *For best results with revolutionary ideas, tie in with established systems.*

Home health care is a coming field, if only to reduce costs of institutionalization, but Congress and the administration have been slow in providing Medicare coverage to "custodial" care. To date, most reimbursable home health services are low paid, and the workers ill-trained. Yet in the long run, as documented by the General Accounting Office , in-home services for all but the severely impaired are less costly than institutional care, such as nursing homes. Anticipate this shift by creating job ladders in home health care. For example, one breakthrough in this field is a proposed project designed to train selected displaced homemakers as geriatric specialists, with a pay scale comparable to an LVN. They will be trained in multidisciplinary skills that will allow them to work effectively in a team to provide home care to disabled elderly patients.

The agency sponsoring research for this innovative project was the National Science Foundation, in conjunction with the Veterans Administration.

Type of proposal: Step 1. Research and foundation laying (Any highly respected research oriented agency, such as National Institute on Aging (NIA).) Step 2. Implementation. CETA Title II classroom training money or "work experience" in conjunction with an agency providing home health care.

7. *Wherever possible, link services and jobs.*

There is a vast array of services for elders, but few older persons work in them for pay. Many CETA primes have provided such services with trainees or PSE's, but have not recognized the need for or value of "paid peers" -- that is, of providing jobs for the "young-old" to assist more fragile elders. A variety of projects could be designed to accomplish this purpose, for example, outreach to isolated persons not served in current programs. Training for such work also develops skills transferable to census taking and market research and other occupations, but most important, provides a source of trained older persons for programs in aging.

Type of proposal: AAA, combining OAA Title IV or CETA II training funds and educational institutions.

8. *The paraprofessional is at the cutting edge of job creation.*

Highly paid professionals such as lawyers are jealous of their domain and usually don't welcome paralegals except as assistants. However, there are strong pressures for new ways to provide "dispute resolution" outside of crowded courts. Perhaps, with the assistance of a public interest law advocacy group, a small project could be designed to develop informal mechanisms for this purpose, as well as training of advocates to help old and poor people through the bureaucratic maze of their entitlements. One of the priority areas for service under the 1978 Older Americans Act amendments is legal services, which will not be fully realized without paralegals.

Type of proposal: CETA II classroom training, with National Paralegal Institute.

9. *Tailor programs to special needs: rural isolation, language barriers, etc.*

Mobile units have been successfully used in extension work to bring services directly to rural areas for years. In one area of rural Washington, an Action-Based Clinic for Displaced Homemakers* partially funded by CETA, includes a mobile unit to reach out to discouraged rural displaced homemakers. The project combines discovery (bringing to light a particularly troubled segment of the population, formerly invisible and mostly on public assistance), with services, linking resources of the community college, CETA and the county Department of Community Services.

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*Action Based Clinic for Displaced Homemakers, Fort Steilacoom Community College - Career Education, 9401 Farwest Drive, SW, Room 6022, Tacoma, WA 98498
Marty Lind, Coordinator (206) 964-6712

Adult education has long been interested in working with basic language skills of migrant workers. However, training and hiring of retired migrant workers to tutor others is rare.

Type of proposal: Governor's 4%, coordinated with state department of education.

10. *Use each project as a stepping stone to longer range goals.*

Another good prospect for a Governor's 4% project, or for a local prime sponsor, is an "age audit" of employment. Nobody really knows how many "early retirees" are really unemployed older persons forced out of the labor market. Mid-years women, especially those with partial disabilities, are marginal workers, particularly in periods of high unemployment. Women "early retirees" are for the most part disadvantaged, without persions and forced to take social security at 62, and very often end on SSI. Since "assessment of need" is a ritual highly regarded by CETA, and the lack of which is a common excuse for turning down even an excellent project, consider using a worthwhile assessment tool which will lay the groundwork for a service program next year.

The mechanism for such an age audit has already been developed* and could be adapted to the particular population and location to be considered. Value of such an audit, beyond the practical one of appeasing the CETA's beast's appetite for numbers, is to gain solid information about discouraged workers, especially older women, and thereby move a step closer to an adequate national employment program.

11. *Develop a consciousness raising industry.*

Styles in clothing, hair dressing, and cosmetics are all geared to the youth cult, especially for women, but the time is ripe for a breakthrough. With the help of donated talent of a leading designer, a "Prime Life Styles" line might be developed by a non-profit agency, to raise consciousness on the beauty of aging ("designed especially for women who have lived long enough to wear them.") Media would love it (man bites dog), thereby providing quantities of free advertising. Incorporate a training program into the production and merchandizing of the products, and/or a sheltered workshop for disabled persons. Plan fashion shows, train models and move out into the community, selling pro-aging ideas along with style. For technical assistance, draw leading merchandizers into the project.

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*Age Audit in Employment, See Resources

Type of proposal: Could be big time Title VII & II training, etc, through PIC or large merchandizing outfit.

12. *Repackaging can sometimes turn exploitive work into worthwhile jobs.*

The broad shift of women into the work force has produced new problems, which in turn provide new opportunities for job creation. For example, with so many two-earner families, there is no one to arrange for appliance repair or manage maintenance functions. On the other hand, many older women are quite handy with the tools of homemaking, and could learn much more with specially designed classes coordinated with vocational education.

Household maintenance contractors could provide an array of services not available in the present system, which assumes a housewife's presence. They could give routine service to appliances and heating systems, arrange for repairs of a more specialized nature, shop for necessary parts and materials. With specific training they could handle security systems and weatherization work. Where "non-traditional" jobs are effectively closed to older women, consider variations on old work methods reflecting newly created needs.

This principle is incorporated into a successful project of the Baltimore Center for Displaced Homemakers, called Magic Mop.[*] The Center trained professional cleaning contractors who work as a crew and who service several clients per day, receiving from $35 to $45 per job. Other possibilities for home-centered entrepreneurship include: marketing service, respite care, children's parties, TLC services for elderly parents.

Type of proposal: Vocational Education.

12. *Define a crying need, then develop a constructive step toward a solution.*

The housing pinch is bad now and rapidly growing worse. No question but that home sharing will increase out of necessity. The Gray Panthers of Seattle in conjunction with the Department of Human Resources, Area Agency on Aging and a neighborhood housing improvement program, developed a proposal for Community Block Grant (HUD) money to make home sharing work.[**] In this plan CETA funded staff will interview prospective sharers, "matchmate" housemates, provide technical and financial information, negotiate homesharing agreements, mediate problems and provide information on related community resources. Home sharing expediters is a new job title for our times, and appropriate work for a trained older woman with long experience in family management.

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[*] Center for Displaced Homemakers, 2435 Maryland Ave., Baltimore, MD 21218

[**] Reported in Gray Panthers Network, July/Aug. 1979. 3635 Chestnut St., Philadelphia, PA 19104

Type of proposal: PSE - work experience.

14. *Build upon a technological advance by pointing out a new use.*

Closed circuit TV is a new technology with great potential. Since the capital investment is high, persons connected with such a project are often looking for new uses to bring in more money. Special programming for isolated elders and disabled persons is one such possible use. An educational TV center in California has already received a sizable grant for such a project. Other educational institutions may be interested in similar projects, and would want to work together with an agency or organization with credibility in the aging field.

Type of proposal: PSE - Governor's 4% or OAA national demonstration grant.

15. *Design training for services coming down the pike.*

"Continuum of care" is a concept whose time has come in work with frail elderly. This includes provision of appropriate assistance: from home care, day care in a center, to institutional care. The Administration on Aging (AOA) in Washington is particularly in favor of such coordinated services, to prevent shunting old people from pillar to post, and so has funded a number of pilots. The State of California, among others, has also funded model projects of this nature. A CETA training program for displaced homemakers or older persons might be feasible within this framework, to develop the knowledgeable and caring workers needed to make such a program successful.

Type of proposal: Joint displaced homemaker program with AAA, educational institution, TITLE II training funds.

16. *Tackle the employment problem from the inside out.*

To help older women break through the job barrier, an obvious place to start is to design placements in the employment department itself. If these persons can be trained to be catalysts from within, to improve consideration of older applicants, so much the better. A successful program called CAL-ESTEEM* has been going for several years in California, with selected low income older workers trained by the Employment Development Department (EDD) to assist older job seekers in the district offices. It has its drawbacks: the participants are paid at a much lower rate than "regular" employees; instead of raising consciousness on age bias, some offices shunt all older job seekers to them; the Department considers itself off the hook in regard to age. But the basic idea is sound. A CETA trained group of older worker specialists could be placed in "unemployment offices" to assist other older job seekers, to do job development, and when their term was up, to find a job for themselves. A necessary component is job readiness to combat the effects of internalized ageism.

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*Cal-Esteem, Employment Development Dept., 800 Capitol Mall, Sacramento, CA 95814

Type of proposal: Governor's 4% or any left-over money in any pot.

17. *When the system breaks down, devise an alternative.*

When things are at a point of crisis, remember the old "ill wind" adage. Some people are profiting from energy shortages and inflation. The high cost of living, especially for low income persons, will revive variations of the barter system, some of which flourished during the great depression. Barter is a system whose time has come and gone and come again, says one proponent. While used as tax evasion by large companies, on a local level it helps to build community.

Be the first to create a non-profit barter center in your area, to provide work exchange, product exchange, learning exchange or whatever. Whether it's an older woman who cooks a meal for a bachelor who does her shopping, or a trade of zucchini for tomatoes, the ramifications go beyond the immediate transaction. The role of the center is to develop the system, encourage participation, maintain records and keep it growing with CETA PSE job slots. Barter for the technical assistance to get it started.

Type of proposal: PSE

18. *To help build coalitions, present a project for more than one significant segment.*

In many communities older white people live somewhat isolated side by side in areas with large numbers of younger minority persons. Animosity between the groups is not uncommon, and some elders are virtually imprisoned by fear. Propose an intergenerational safety project which would team CETA trainees -- one young minority, one older neighbor. The teams could be trained in the skills of block organization, safety techniques, race and age relations and information on community resources. Several teams could organize a whole neighborhood for mutual safety. For positive consideration by a prime sponsor, the project should be presented together by organizations representing minority and aging groups, churches in the community and should be favorably viewed by persons with local political clout.

Type of proposal: Might combine CETA Title II training funds with revenue sharing money to pay for the jobs.

19. *Combat age discrimination head-on through the system.*

State and local government is almost as discriminatory to older persons as business and industry. One may pass the written exam with flying colors, but be consistently eliminated by the oral interview. Unconscious ageism ("she wouldn't be happy in that job", "overqualified", "older than the supervisor", etc.) plays a strong role in the selection process. Therefore, design a program to assist older people to break the age barrier, by providing classes in how to prepare for relevant civil service examinations, coaching for the oral interviews and detailed information on laws (state and federal) on age discrimination. Participants should be prepared to appeal if they are rejected on the oral exams (in California, most persons who appeal on age grounds win their cases) Developed in conjunction with a public service law agency, such a program could dramatically lessen age discrimination in public employment.

Type of proposal: Governor's 4% or CETA classroom training, Title II.

20. *Use CETA funding to raise its own consciousness and to monitor its program.*

The Governor's 4% funds are a possible source of money for a conference on employment and training for older workers. Bring together representatives of primes, state CETA council and staff, aging and older women advocacy organizations, employment services and key legislative persons. Prior monitoring to document gaps in service or inappropriate programming, together with constructive ideas for improvement, could make such a conference a turn-around point, especially if the governor sponsors the event and participates.

Or consider a CETA monitoring project. The Wisconsin Governor's Manpower Services Council (Governor's 4%) gave the Wisconsin Commission on the Status of Women $49,000 for a one-year study of the employment experience of women who have completed CETA training. The League of Women Voters has developed a detailed memorandum on how to conduct such a monitoring project.*

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Blue sky job development can go in many directions: in traditional and non-traditional fields for women; in new fields not yet sex segregated; in public service and private enterprise. Some of the best prospects are twists to familiar and usually exploitive types of work, or in new fields in the process of developing their own job titles and career ladders. All will take creative energy to articulate, ability to work through existing agencies, persistence and a good deal of luck to implement. A motto to remember: USE THE SYSTEM - IT HAS USED YOU.

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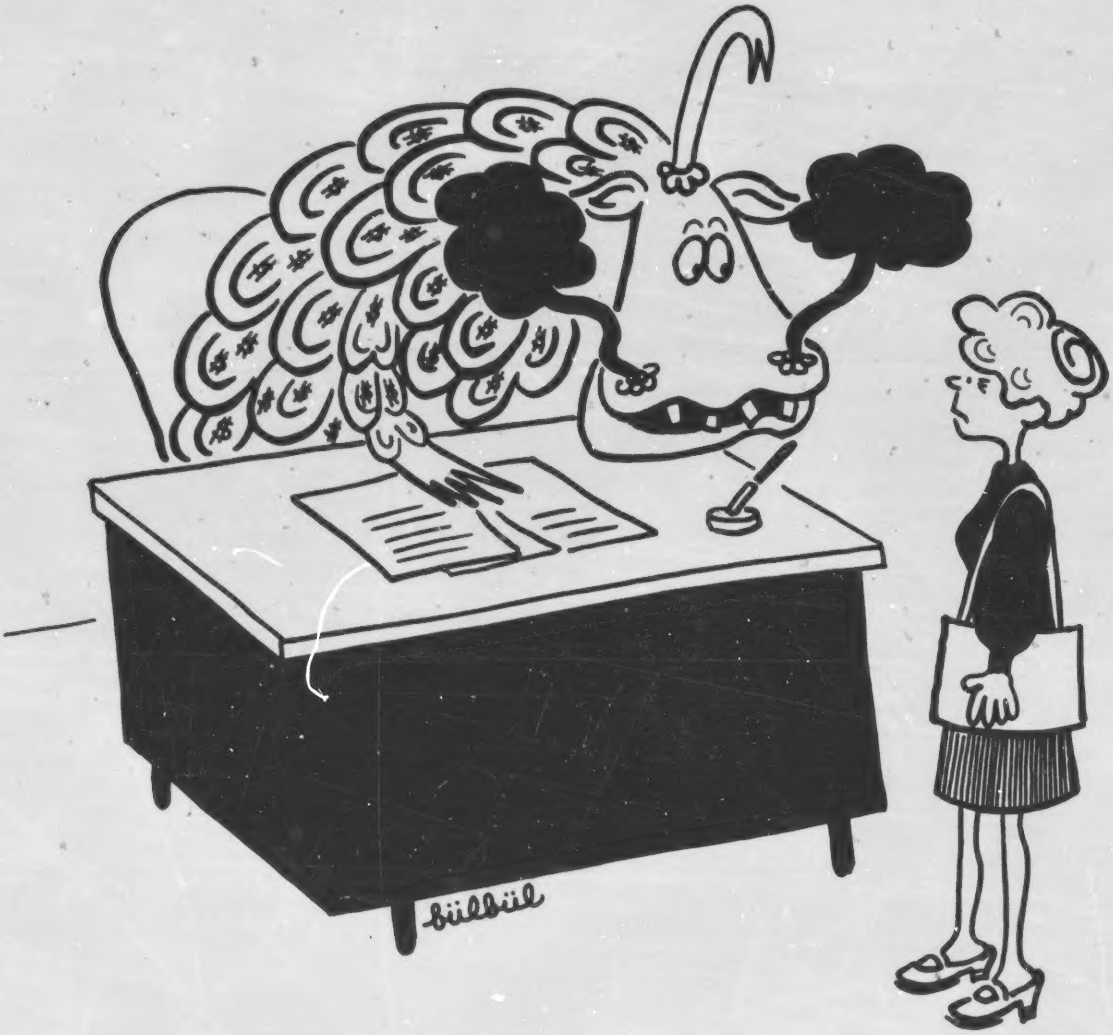
*LWV Memorandum on CETA monitoring. Carol Payne, staff specialist. (See Resources.)



"Job? Why don't you get married again?"

V. THE DATA GAME

You can do anything you want with statistics except ignore them. You can prove any point by proper selection of data which substantiate your position, but lack of statistics leaves you at the mercy of any opposition, who undoubtedly will have some figures to "prove" that you are wrong. So the data game is a classic "If you can't beat it, join it" situation.

The proper attitude toward statistics is a middle course between awe of numbers and complete discounting of their value. The most constructive approach is to view collection, analysis and use of data as skills to be learned to accomplish your goals. But women, because of traditional training and expectations, are often afraid to deal with figures and so pass the job along to a bookkeeper or accountant. These are technicians. Decision making should reside with the leadership of any project, and that includes: what do you need to know, what categories, how should the raw data be collected, etc? Therefore, anyone in a position of leadership related to CETA (or any other bureaucracy for that matter) needs to feel comfortable with statistics and to learn how to make them useful tools.

CETA AND THE NUMBERS RACKET

In industry, productivity is measured by the relative balance between investment of resources and output. CETA reflects this same philosophy for better and for worse. For better, because "accountability" for promised social benefits is a built-in requirement (how else could we monitor whether older women are served?). For worse, because delivery of some human services is not easily quantifiable, for example, a shift from despair to a new outlook on life. Also, the major energies of an agency are often diverted into statistics gathering, and decisions are made not necessarily in the interests of the participants but to make figures look good.

"Accountability" is a major reason why older women are so often screened out, because they are seen as poor risks who would lower the success ratio. (Curiously, no one questions the cost-effectiveness of statistics gathering and "evaluation", which consume a large share of funds earmarked for needed services.)

To CETA, the "output" measurement is fairly cut and dried: how many persons (within each category for which statistics are kept) are trained, placed in jobs or went on to further training. "Proven effectiveness" means that for the money spent, the number of bodies (of the appropriate categories) which have moved from the negative column (unemployed, disadvantaged) to the positive column (unsubsidized employed) is at least as good as average.

There are three parts to the CETA numbers racket:

1. Needs assessment. "First show us the figures on the number of persons who need that service." No matter that the money available is barely enough to take care of a group which could fit into one small room. How many thousands are there eligible for the service? Needs assessments are expensive, time consuming and often a farce, but they appear to be a necessary component of service delivery planning.

One way to cope: Sometimes the needs assessment can be turned into a useful, funded project which can become a launching pad for direct services. Examples include a community survey such as an age audit on employment (see resources); the community forum approach, which is collection of information from residents of a target area using the town meeting format; survey of related service deliverers to discover how many of the target group who seek help in mental health, crisis clinics, etc. have employment problems. Wherever possible, use statistics already gathered and adjust to the specific community.

2. Assessment of effectiveness. This answers the question, "But does it work?" The more innovative the project, the greater the justification for postponing assessment to give it time to produce results. But refunding usually depends on speedy success/cost ratios.

One way to cope: The data game forces a more limited, piecemeal perspective. In order to have a clear statement of the aims, target group, and services to be performed, all quantifiable, the problem must be cut down to bite size. For example, instead of addressing "the plight of the displaced homemaker", which comprises a hodgepodge of interrelated problems, define specific, limited goals from the start, and design instruments to record progress, all in strict accord with CETA data requirements. (Ask for technical help if necessary.)

Over a long period of time, piggy-back projects can be added with ancillary goals to enrich the program, perhaps with other funding sources. Think of incremental steps forward. (Rome wasn't built in a day) This is how large community development corporations grow, with one limited project grafted onto another until finally there is a spreading chestnut tree. Some women's centers are growing in this manner, such as the Career Planning Center in Los Angeles, described earlier, Wider Opportunities for Women in Washington, D.C. and New

Directions for Women in Baltimore.*

3. Monitoring. The shoe is now on the other foot. All those statistics which have been the bane of service providers, and collection of which is the primary occupation of CETA staffers, are the nuts and bolts of advocacy for an excluded or underserved group. Prime sponsors must submit quarterly summaries of "participant characteristics" and an annual report of detailed characteristics, and these are available to the public under the Freedom of Information Act. So, with persistence, advocates for older women can determine how well we're doing in CETA programs.

However, securing reliable unemployment figures for this group is something else. Since "unemployed" is now defined as someone who has "sought work" (where they are counted) in the past four weeks, most older women who would like to work if they could get a job, are statistically invisible.

HOW MANY ARE THERE?

The needs assessment problem discussed above is particularly relevant to older women. Since homemaking is not counted as work, there is no reliable count of displaced homemakers, for example. During three years of legislative advocacy, the Alliance for Displaced Homemakers estimated that there are between 3 and 4 million such women nationwide. But in order to allocate its funds equally between regions, ETA needed "official" figures. Based upon the "Survey of Income and Education, March 1976", the most comprehensive national survey of marital status, labor force participation and income, the Women's Bureau of the DOL estimates that there are 4 million displaced homemakers, 3 million of whom are between the ages of 40 and 64. Two million women in this age group fall within the CETA eligibility guidelines. With this information, the Women's Bureau prepared tables to cover the ten federal regions, states and selected Standard Metropolitan Statistical Areas. Data are broken down by age and race/ethnicity.**

This is an example of how new data are created. When the data that you need do not exist, what do you do? You draw up a set of hypotheses, extrapolate the data, always justifying your hypothesis. Document the assumptions the best you can with available statistics.

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*New Directions for Women, 2517 N. Charles St., Baltimore, MD 21218

**Women's Bureau (See Resources)

The Alliance for Displaced Homemakers asked: how many women not in the labor force between the ages of 35 and 64 are single, widowed, divorced or separated and have no children under the age of 18. With the help of a graduate student in statistics (the technician) and at a cost of $200, the ADH came up with very useful, if not reliable figures based on census figures, which provided the necessary data for the legislative campaign. Four years later, the Women's Bureau repeated the process in a more sophisticated manner and came up with comparable figures for CETA use. Since 1976, as state legislated displaced homemaker programs developed, needs assessment studies were done in several states, e.g., Arizona, Hawaii, Nebraska. Check your state Commission on the Status of Women to find out if such a study has been done.

As mentioned earlier, needs assessments can be built into a project as step one. In working creatively with data, find someone not directly connected with the project who feels comfortable playing with statistics, who can act as a paid or unpaid statistical consultant. A former government employee might be a candidate. Such a person on your advisory board can also be helpful in negotiating with CETA staff. Warning: don't be in awe of the consultant. Her/his function is to help you prove what you want to prove -- not to tell you what you can or cannot do. Just because you can prove anything with data doesn't mean you can create unjustifiable figures. To do so is to lose credibility.

THE PRIME SPONSOR'S QUARTERLY REPORT

From a monitoring viewpoint, the Quarterly Summary of Participant Characteristics is the basic document, so it is useful to become familiar with it. Its stated purpose is to provide information on socioeconomic characteristics of those served by each title of the prime sponsor's program.* Your organization can ask to be placed on the mailing list of those receiving the quarterly reports.

The Quarterly Summary** provides the data that the feds require of the prime sponsor, which explains why subcontractors must collect all this information, prying into personal lives and spending too much time in filling out forms. As stated before, all this data gathering works both for and against us.

CROSS TABULATION

Although Sec. 127 (d) (2) of the Act does require "cross-tabulation" of data, age and sex are not specified. The Senate version stated that reports should include "participant characteristics (cross tabulated) by activity including age, race, sex, national origin, handicap, education level, and previous wage and employment experience"*, but the Conference Report (of House and Senate) deleted the specifics, so the language in the Act is vague.

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* Forms Preparation Handbook. Employment and Training Administration, U. S. Dept. of Labor, 1979.

** For sample report form, see Appendix.

Only pressure can make cross-tabulation by age and sex a reality. When monitoring CETA, this is a key question, because such cross-tabulation will reveal that middle years and older women have been neglected (subsumed under "women" or "older workers"). This new requirement could help bring them out of the shadows, because if something isn't counted it doesn't exist as far as CETA goes.

MORE DATA DOPE

When preparing your reports or proposals, don't neglect graphs, tables and charts.** Let someone with an accountant mentality go over them to catch any errors which might otherwise discredit the rest of the data.

Don't miss deadlines. It is better to send in an incomplete report on time than a full one late. If inadequate, indicate that revisions are on the way, or say in your cover letter, "We will be happy to provide further documentation upon request." (A traditional bureaucratic version of "We will comply".)

Don't wait until report time to gather data, but begin collecting needed information from the start. It is very difficult to backtrack.

Find an inside data person you can work with. (Underlings usually collect statistics and may be delighted to have a real-life program to relate to.) Rather than doing all the spade work, ask if there is anyone in the department who extracts the type of information you need.

Develop the best forms you can and then pretest them. Don't change them unless alsolutely necessary. If you must, do so by addition. For example, you have been using the age breakdown, 55-64, but now you need information about 62+. Keep the old category but add the new one.

If you sense you will not be able to meet your commitments, don't wait until you dig yourself into a hole to ask for help. For example, suppose you are providing training predicated upon jobs which don't materialize as fast as you expected. You may need to make a shift, which can happen more smoothly if the funding agency is informed and participates in the change of plan.

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*U.S. SENATE, Comprehensive Employment and Training Act Amendments of 1978. Report No. 95-891, p 213

**For an excellent example of data presentation, see Appendix

Be realistic, even conservative, on goals, You don't gain by making promises you can't back up. Suppose you think that you can train and place twenty persons in a given time, but the sponsor wants you to promise fifty to get it funded. Especially in starting, hang tough. A successful small project lays the groundwork for future larger ones.

If what you want is not available from CETA, try city and county planning departments, government libraries, ETA clearing house and regional clearing house, health services agencies and area agencies on aging, United Way, etc.

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Data gathering, like the rest of CETA, has potential, but don't get hung up on it. In the next section, we will explore other pitfalls and contradictions and how to work around them. If data problems can be mastered, nothing else should be too difficult.

Down by the old..main..stream, numbers count, not..you..
27.4%
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VI. CONTRADICTIONS AND PITFALLS AND HOW TO WORK AROUND THEM

"If life gives you lemons, make lemonade" was never truer than in working with CETA for older women. There is a pervasive male slant, a strong youth bias, an assumption that there are innumerable jobs out there waiting for "trained" applicants and that employers are anxious to cooperate. Not so. Nevertheless, since CETA is the existing government employment and training program and is well funded, it makes no sense to ignore it or merely to decry its weaknesses. There are innumerable pitfalls and contradictions within it, but knowing what they are sometimes makes it possible to skirt around the edges of the pitfalls, and to use the contradictions as leverage for new ideas. Recognize CETA for what it is -- a beast with potential.

Contradiction: Title II puts major emphasis on training. Since large blocks of persons experience "structural unemployment" (can't get jobs even in good times), it is assumed that the major problem is lack of training, despite our plethora of educational programs on many levels. Most of these training programs are designed with younger "disadvantaged" persons in mind. Yet older women have usually had many years of experience as homemakers, workers and volunteers. They are not empty vessels. Their job fears are likely to be quite different from those of the young person entering the job market for the first time, and their job needs may be quite different as well.

> *Turning it to your advantage: The above offers leverage to advocate for a special program for displaced homemakers or older persons. If the "mainstream" is not effective, that is grounds to work for a categorical program in the local area. Raise consciousness on the need to build onto skills already developed. Push for recognition of life experience. Develop arguments for the specialized services needed by this group, and back it up with political clout. For example, Fresh Start Training Program* was initiated in New York City because the umbrella manpower programs could not provide meaningful assistance to people 40 and over, and was funded by a CETA 4% Governor's Grant.*

Pitfall: Veterans preference impacts negatively on women generally, both in training programs and public sector employment. It is particularly unfair to older women, who were systematically excluded from military service in their younger years.

> *How to by-pass: The tight eligibility requirements of the new CETA make "creaming" more difficult. The stronger emphasis on low income can be an advantage for older women, who are more likely to fall into poverty brackets. To combat the built-in male bias of veterans' preference, play by the rule book in regard to economic disadvantage, and brief applicants on definition of family income (see pp 12 & 89. before they apply.*

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*Agudath Israel of America, 813 Avenue H, Brooklyn, N. Y.

Contradiction: Because of the practice of both CETA and vocational education training to track women into lower paying traditional women's fields, there has been a strong push from the Women's Bureau and from women's organizations to open up non-traditional jobs for women. However, traditional male jobs, while better paying, are difficult to break into, are often physically too demanding for older women, and there are frequently age barriers in apprenticeship programs.

> *Turning it to your advantage: Consider fields with fewer of these drawbacks. For example, the Baltimore Center for Displaced Homemakers overcame the reluctance of a voc. ed. institution under pressure to overcome sex bias, and found a sympathetic teacher to train as draftsmen (sic) twelve older women who had handiwork skills. Transference of hand-eye coordination skills made them good performers, so that the administrator came back for more. Best prospects for breakthroughs are in new fields with less entrenched opposition to women.*

Pitfall: Upgrading and retraining provisions[*] are intended to offer additional opportunities to subgroups such as women and minorities who are locked into low paying, dead-end occupations. But they must be directed toward occupations with demonstrated skills shortages, in occupations of high stability, that provide a reasonable expectation of continued employment, etc, etc. There are few occupations which meet all these conditions. While the intention is good, the practice may reinforce old patterns. For example, in one area, CETA funded a home health care training program which provided more in stipends during the training period than the prevailing wage for that occupation. Often there is a good reason why jobs go begging, and it usually is low wages and lack of advancement opportunities.

> *How to by-pass: Nowhere is it written in the Bible that home health care has to be low paid and dead-end. Linking up either with a public agency or a (caring) private firm and an appropriate college, devise a home health care training program, some form of credentialing, a new job title (without the word "aide"), perhaps on-the-job training and jobs at the end of the line.*

Contradiction: Political pressure to reduce the public payroll has shifted the thrust of CETA to the private sector "where most of the jobs are". But, on the edge of a recession, employment opportunities are shrinking, not expanding. It is in the interests of business and industry to reduce the public payroll for reduction of taxes, but not in their interests to increase their own payrolls. On the contrary, profits and productivity increases are predicated on reduction of workforce. The new provisions (Part 679, Private Sector Initiative Program) are essentially carrots "to increase the involvement of the business community in employment and training activities under the Act".[**] The primary vehicle for accomplishing this are Private Industry Councils (PIC's), to work closely with the prime sponsor as a "local partnership".

> *Turning it to your advantage: With diminishing public sector jobs, where else is there to go? The PIC's at least offer consciousness raising in the business community on skills acquired through unpaid work, for promoting "Hire the Older Worker" events, and for devising innovative*

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[*] 20 CFR §§677.21-677.24

[**] 20 CFR §679

on-the-job training plans. Older women have one source of power in the private sectors: they are consumers. Using the carrot principle, devise and sell new ideas for service for this constituency. For example, banks cater to older persons who have special financial needs. Special service representatives for seniors and middle-aged women on their own would be good public relations, relieve other bank personnel and increase business. It might not be too difficult to convince a larger bank with a number of branches to train a group of older women as service representatives, utilizing CETA funds. Their risk would be minimal and, if the service proved profitable, it might spread to other banks and financial institutions. Main point - this would be creating jobs which don't currently exist, and for which many older women would do extremely well because of their life experience.

Another area which might benefit from PIC assistance is self-employment. PIC's may provide sources for technical assistance, a "big brother/sister" relationship, or loaned staff, helping a non-competitive self-employment project get underway.

Pitfall: There are a number of provisions in the regulations to placate labor unions. These relate to contracts with collective bargaining agreements, prevailing wages, and apprenticeship regulations. Older women coming back into the workforce are likely to experience these as roadblocks.

How to by-pass: Initiate discussions with labor representatives, especially members of the Coalition of Labor Union Women (CLUW) about those fields which are unorganized and/or which are predominantly women in lower paid jobs. Are there possibilities of working with local unions for training which can help provide upgrading and better salaries in the nursing home industry, for example? Raise the question of elimination of age barriers in apprenticeships as a woman's issue.

Pitfall: In selecting service deliverers, primes "shall give special consideration to CBO's with programs of demonstrated effectiveness in the delivery of employment and training services."* This can be a catch 22. Since there have been few CETA programs for displaced homemakers or for older workers, there are few service deliverers who have proven effectiveness. Like the new job applicant, how do you break in to get the needed experience?

How to by-pass: As far as delivery of services to this clientele, there has been very little "demonstrated effectiveness". Starting with the viewpoint that you are the experts in this specialized field, negotiate with sympathetic CETA staff (see Chapter III). Show that your constituency is willing to put some effort in getting a program started.

Contradiction: While it is the purpose of CETA to provide job training and employment opportunities to increase earned income and assure that these services lead to maximum employment opportunities, etc., etc., they do not and cannot provide the actual jobs. Is it not "unfair" to build up women's hopes, which if not realized, may leave them angry and bitter?

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* 20 CFR §676.23(c)

How to cope: Whether or not the actual planned jobs materialize or not, both participants and staff are learning transferable skills, and gaining experience which will make them more employable than when they started. If the problems ahead are made clear from the beginning, and shared by all, anger generated by fading of job prospects can be directed in a constructive way toward the government's employment policy and the Department of Labor which administers it, instead of being internalized as depression. Better to try and fail than not to try at all.

Contradiction: The DOL usually falls behind its own timelines but budget deadlines remain rigid. So the squeeze is pushed down the line. Subcon-contractors are expected to drop everything and react immediately when the bureaucracy is at last ready to move.

Turning it to your advantage: Spending all that money is not easy for the prime sponsor (and other government funding sources) so there is usually money left over close to the end of the budget year. Anticipating this windfall, be ready with proposal designs which can rapidly be adapted to leftover pockets of money. Another function for the friendly insider.

Pitfall: Title VII, which authorizes employment and training activities in conjunction with the private sector, has a strong male slant. Women and women's organizations are rarely mentioned. Participation of women in the Private Industry Councils (PIC's) is not required or specified except as they are included in the definition of economically disadvantaged.*

*How to cope: Women's Work Force,** a national resource and advocacy network for women's employment programs, says that because women and women's groups are not mentioned very much in the regs, participation in planning and monitoring efforts will be much more crucial in Title VII than for other titles. Since this title has been singled out as the wave of the future, we had better learn to ride it.*

Contradiction: CETA encourages, and often demands coordination and linkages by subcontractors. Sometimes a multi-funded approach is the only way to get a job done. Yet there is little coordination from the top, so that funding cycles don't coincide, closeouts and startups cannot be made in an orderly way, planning cycles are not coordinated, and reporting and accounting procedures are sometimes in conflict.

*How to cope: Buy a large bottle of aspirin. Baltimore's New Directions for Women*** maintains 13 different bank accounts to avoid co-mingling of funds. A "matrix management plan" has been developed which relates*

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* 676.44 (a)

** New CETA Regulations: Some Improvements for Women. Women's Work Force. Washington, D. C. 1979. See Resources.

*** New Directions for Women, Inc., 2517 N. Charles Street, Baltimore, MD 21218 *to all grants, making it possible to expand or retrench. "The needs are present, the solutions not easy, the work overwhelming but the satisfaction and growth are unbelievable."**

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Most of the pitfalls and contradictions within CETA apply to other "significant segments" as well, and therefore suggest issues for coalition effort. One strategy is to call a meeting of representatives from other organizations who want CETA funds to discuss problems of CETA and what should be done about them. If grassroots groups join forces, they can have much more impact on how the prime sponsor functions in practice.

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*Marian Goetze, Director, Baltimore New Directions for Women. Quoted in Displaced Homemakers: Program Options. Displaced Homemakers Network. See Resources.

WE CARE!!
WHO CARES LET THE D.O.L. DEFINE IT!
SENATOR BUCK PASSER
CETA ACT
WHO CARES LET THE PRIMES WORRY ABOUT IT!
GOD BLESS OUR BUREAU
CETA REGS
WHO CARES IF IT LOOKS COST EFFECTIVE
$ $ $ $ $
CETA PLAN
bülbül

VII. THEORY AND PRACTICE OF ADVOCACY

Advocacy is the name of the game when it comes to making CETA more responsive to older women. Whether it is advocacy for recognition of this constituency as a "significant segment", developing training programs and Public Service slots with an advocacy component, or monitoring local programs to see that older women are not excluded, taming CETA depends on well-orchestrated grassroots pressure. Here are several different models for action, followed by twelve general principles for developing advocacy consciousness.

FOUR MODELS FOR ADVOCACY

Whether the group consists of three concerned individuals, is a large and well established agency, or represents a volunteer body of an Area Agency on Aging, there are ways to bring CETA around to do its duty. Variations on the following models are limited only by imagination and commitment.

1. The Chicana Rights Project of San Antonio*

In 1974, the Mexican American Legal Defense and Educational Fund (MALDEF) founded the Project to focus on CETA, with the broader goal of upgrading the employment picture for Chicanas. First, the City of San Antonio's plan was analyzed for:

1) over-all participation rate of males and females as compared to their respective unemployment rates. *(note: for older women, get both age and sex figures and insist upon cross classification)*

2) participation rate of males and females entering employment as compared to their respective unemployment rates *(for older women, same as above)*

3) designation of significant segments of the population to be served, *(are displaced homemakers and older workers so designated?)*

4) participation rate of males and females in the various job categories, career fields, training programs and other manpower services provided under each program *(seek both age and sex data)*

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*MALDEF: Chicana Rights Project, 201 N. St. Mary's St., San Antonio, TX 78205

5) effectiveness of equal employment opportunity programs in assuring non-discrimination and eliminating artificial barriers to employment. *(for combating age bias, see Chapter VIII.)*

The data were included in exhibits which were part of a formal complaint filed with the Assistant Regional Director of Manpower, DOL, charging that the plan failed to provide for equitable distribution among the significant segments identified by the prime sponsor. The Project discovered that while "paper plans" appear to be sensitive to local needs and prime sponsors do make apparent efforts to correct inequities when public demand dictates, only aggressive monitoring to assure compliance with standards in the law brings about substantive change.

2. League of Women Voters Monitoring Project*

In response to the League's special program emphasis on the interrelationship between employment and income assistance, the LWV Educational Fund prepared a detailed memorandum on monitoring for Leagues interested in CETA. The memo recommends a thorough study of the local prime sponsor, participation in the planning process, seeking representation on appropriate councils and, if necessary, publicizing prime sponsor deficiencies and instituting litigation. It emphasizes the importance of coalition efforts.

While not all Leagues have focused on CETA, this organization should be a valuable ally in working for fair share.

3. Center for Displaced Homemakers, Baltimore, MD.**

As part of the Center's efforts to make the local CETA more responsive to displaced homemakers, every woman who comes to the Center for services is encouraged to report to the CETA office to register for services. The Center provides each participant with a form upon which her CETA counselor is to verify if she is found eligible for services. The Center then follows up on the services provided on a monthly basis, collecting hard data on a person by person basis.

The Center has also collected anecdotal information concerning ageist and sexist attitudes, bureaucratic boggles, and other barriers to services.

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*CETA Monitoring Memo. (See Resources)

**Center for Displaced Homemakers, 2435 Maryland, Baltimore, MD 21218

With such data, the Center stands in a strong place to negotiate with the prime sponsor. It can show that a significant percentage of persons listed as a "significant segment" are not receiving services, and thus clear the way for a proposal to increase services. If negotiation is not possible, hard data are available, should a complaint be required.

4. Area Agency on Aging.

While we could not pinpoint a specific AAA, there are undoubtedly some which have seen the potential of CETA for employment of older persons. Constituency advisory councils to these AAA's are at the heart of senior advocacy, and often have developed considerable clout working for fair share of revenue sharing monies for varied purposes, Federal Community Development Block Grant money for home improvements and low interest loans, etc. Nutrition sites provide opportunities for mobilizing support.

Our model AAA Advisory Council would be one that already has an employment committee, which oversees a limited jobs program for older persons, conducted by Senior Community Service Employment Program enrollees. Despite their limited hours and minimum wage, these persons will have managed to help a number of older people get jobs, because they cared very deeply. Now, with the support first of the employment committee, then the entire Advisory Council, they move to expand with the help of CETA. Armed with the new provisions of Title III, Section 308, they draw up a draft proposal, seeking sympathetic CETA staff to help.

If CETA is not responsive, the Council puts into practice the well developed advocacy skills acquired in cracking other parts of local government. Since the AAA is a parallel agency, it has the necessary stature to tackle the prime sponsor, and alliances within the aging network can provide the guts and stamina to get the job done.

TEN PRINCIPLES OF ADVOCACY

1. The basic "problem" does not lie with older women themselves as much as with a society which condemns them to the scrap heap with a quarter or a third of life still to go. While attention must be given to refurbishing frayed self-images and developing necessary skills, the external blocks and handicaps (age prejudice, shortage of jobs, etc.) are a reality which must be dealt with as well.

Since there is no better way to combat a poor self-image than to become involved in improving conditions for ourselves and others, self-advocacy efforts are essential. To put it succinctly: don't agonize, organize!

2. Face the underlying dilemma: there are not enough entry level jobs with prospects for advancement to go around for all structurally unemployed groups. In every proposal, try to include ways to open new job opportunities as well as to improve the competitive position of older women in a shrinking job market. In the long run, an effective national employment program is the only viable answer; in the meantime, put creative energy into projects which demonstrate new jobs for the future.

3. Turn lemons into lemonade. The obstacles themselves may be the advocate's best entry point. Isolated by poor transportation? Brainstorm a project to develop a mobile unit to bring services where needed. Participants unwilling to use government agencies? First develop a self-help project as a stepping stone to using the system.

4. Use the weight of the system against itself and play by the rule book. By pressing on bureaucracy wherever it is vulnerable by virtue of its own regulations, you force it to deal with the issue at hand, if only to get you off its back. Even administrative laziness can work in your favor. An offer to help may lead to a productive working relationship with staff. Learn CETA-speak and help others learn the lingo, to empower yourself and the cause of older women. But use the language without letting your own grassroots-thinking be corrupted by bureaucratic mystification.

5. Individual action is essential but group process is primary for effective advocacy. Planning to visit a CETA official? Make it a delegation. Or invite the politician to your group meeting to answer questions and to interact with your constituency. Direct involvement by older women themselves improves knowledge, confidence and commitment, and helps build a power base.

6. Speak softly but stand erect. The approach should be probing without alienating. Assume the desire of CETA personnel to help you help them garner

brownie points by implementing the law. Make what you want very clear.

7. Draw the problem out of the shadows to bring the weight of public opinion to bear. Media can be the most effective tool to overcome the isolation of persons who are hurting, and to unite those who "thought I was all alone". Also, when a problem is aired publicly, it becomes more real to decision makers who pride themselves on being on top of every situation.

8. The dividing line between served and server should be a narrow one. The service provider should preferably have experienced the problem personally, or if not, at least to see herself as a resource person, offering technical assistance to help people use the system more effectively. Involve older women in problem solving every step of the way, providing needed strokes and support to develop self-sufficiency. Mutual help overcomes dependency on professionals.

9. Emphasize the link between services and jobs. For example, middle aged and older women occupy a special place in service delivery to the elderly. Former homemakers are experienced providers of TLC, with skills which can be recycled into varied services to the frail elderly to prevent inappropriate institutionalization. Age should be a plus in working with older persons. When designing programs to provide services for older persons, think jobs for older women, and build in the necessary training.

10. Power goes to those who ask the right questions. If you start out with some knowledge you can ask better ones, but never be satisfied with pat answers. Continue to probe, checking various sources. Investigative reporters are good models to follow (as well as being good sources of information).

11. Choose strategies which bind divergent groups rather than divide them. When resources are limited, crumbs are thrown out for the disadvantaged to scramble for. So work for policies which benefit all excluded groups, or at least don't benefit one at the expense of others.

12. Make it a pleasure. A bus trip to a crucial city council meeting or the statehouse, with songs and sociability built in, can instill a sense of solidarity which can turn a life around from despair to hope. When politiking a

proposal, provide briefings before each action, prepare for important encounters by role playing, and hold a debriefing afterwards, always interpreting the glass as half full rather than half empty. Advocacy can add zest and new meaning to life.

An effective advocacy base is not built in a day; it is an accumulative process. Start wherever you are, using each project as a stepping stone to the next. With an active constituency base, a small community based organization (CBO) could grow in a few years to a powerful community development corporation.

VIII. LEGAL RIGHTS AND REDRESS

Advocacy takes many forms, and one is utilizing "administrative remedies" written into legislation. Another is use of the courts. The women's movement has made many advances through effective strategies in both areas. Either way, you are asserting that the law or its regulations are not being followed -- that CETA, in this case, is breaking the rules.

So first you have to know the rules. CETA regulations comprise a labyrinth of detail. There is so much to wade through that the nuggets are easy to miss. Here are some specific provisions which might provide handles for legal advocacy.

- Primes have the duty to allocate services on an equitable basis among the significant segments, including displaced homemakers and older women. (676.54, 677.15 (b) (ii), 677.56 (b) (1), 678.(b)(1), 679.5(d)(ii)).
- Discrimination on the basis of age,sex or handicap is expressly prohibited. (676.52 (a)).
- Affirmative action on behalf of the handicapped is required of every prime sponsor. (676.53 (a)).
- All primes are "encouraged" to take affirmative action with respect to previously underrepresented groups. Those primes which have been determined by the DOL or another federal, state or local agency to have discriminated must undertake an affirmative action plan to overcome the effects of that discrimination. (676.53 (b)).
- Activities and services must go to those most in need, including older workers. (675.6 (b), 676.10-4 (c)(1)(i).
- There is a duty to eliminate architectural barriers to employment. (676.52(d))
- There is a duty to eliminate artificial barriers to employment, such as age, sex or the absence of part-time work. (676.52 (e)).
- There is a concomitant duty to develop alternative work arrangements, i.e., part-time work and job-sharing, especially for older workers. (675.6 (e), 677.13 (b)(6)).
- The prime sponsor must include CBO's in the planning process, insofar as they are not represented on the council. (676.6 (a)).
- Prime sponsors are required to compile and maintain a publicly available inventory of potential service deliverers which have expressed in writing an interest in being on the inventory. (676.23 (b).
- Prime sponsors must also provide opportunities for businesses owned by women to compete for procurement contracts, and are authorized to use set-aside monies for this purpose. (676.11 (c) (5) (iv), 676.37 (d and e)).

- Primes must make every attempt to eliminate sex-stereotyping. (676.52(c)). Further, Sec. 311(d) of the Act authorizes the Secretary of Labor to investigate the extent to which job and wage classifications undervalue certain skills and responsibilities based on the sex of persons usually performing that job.
- Activities and services are to be specially designed for older workers. (677.13(d)).
- The introduction to Title II-C (upgrading and retraining) states that this section should focus on women since they are frequently locked into low-paying, dead-end jobs.
- Primes must recruit women and encourage their entry into occupations with skill shortages where women represent less than 25% of the labor force. (676.52(c)(1)).

Remedies under CETA are often slow and stacked against you. Law suits are expensive and even slower. But there are times when their use is the only way to break a log jam. And sometimes a series of complaints or just the threat of a restraining order can make an unresponsive bureaucracy shape up. So add these legal weapons to your arsenal. Using them in conjunction with other advocacy techniques, you are in a much stronger position.

THE COMPLAINT PROCESS

A complaint means your beef, but it also means a written statement of that charge. If you think CETA has treated you unfairly on account of your age, sex and/or handicap; if your application has been denied or you have been terminated prematurely; if you believe CETA is systematically failing to meet the needs of older women, you have a complaint. You are expected first to try to resolve the problem informally by talking to the appropriate persons (project director, prime sponsor staff, etc.). If that doesn't work you can file a formal complaint.

How can the CETA regs be the basis of a complaint?

1. Lack of equitable service. Both individuals and community groups which have sought to monitor the local CETA program may bring a complaint if they believe the prime sponsor's performance varied more than 15% from its approved plan. They may also file a complaint if the prime or a subcontractor has denied them access to information which they need in order to determine whether or not the prime is in compliance.

2. Staffing patterns. Prime sponsors must make special efforts to recruit and hire staff who will reflect the makeup of the population of the area by age and sex, and they must take corrective action if staff makeup varies significantly from this goal (676.52(h)). So if no older women are hired, that might be grounds for a complaint. Furthermore, a prime wishing to set up a displaced homemakers program using Title III funds must assure the DOL that "to the maximum extent feasible, supervisory, technical, and administrative positions within the programs shall be filled by displaced homemakers".* If there are no displaced homemakers on the staff of such a program, that would be grounds for a complaint.

3. Failure to eliminate artificial barriers to employment and sex-stereotyping. Artificial barriers are limitations on hiring, promotion, licensing or conditions of employment--such as age, sex, physical status (being too fat?)--that are not directly related to an individual's fitness or ability to perform a specific job. That covers a lot of ground. This means, for example, that the prime should seek to remove age barriers in regular (non-CETA) employment within city agencies, so that older CETA participants can be transitioned into regular city jobs. A consciousness-raising complaint might be filed against a prime who does not make efforts in these directions.

4. Assurances from Subrecipients. When CBO's apply for CETA training or employment slots, they must sign "Assurances" which specify, among other things, that they will not discriminate against any participants or applicants on account of their age or sex. If a subrecipient violates its assurance, this is grounds for a complaint.

5. Denial of Funding. CBO's which applied for funds for a CETA training or employment program but were denied such funds, can appeal this denial by filing a complaint either if they were not given reasons for their rejection, or if they believe that the stated reasons are spurious.

6. Individual complaints. A handicapped person is denied a PSE position because the job was not wheelchair-accessible. Cite regulation 676.52(d) in your complaint. An older woman was denied a PSE position because she was too close to

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*CETA Amendments of 1978 P.L. 95-524. Sec 301(b)(1)(A) retirement age. Site 676.52(e). A middle-aged woman was denied training because apprenticeships in that job had age ceilings. Cite 676.52(e).

In other words, if you are well versed in the rules, there are many possible grounds for complaints. Some of the rules are purposely vague and subject to various interpretations. In general, the primes will run the show as they please, unless there is a squawk. As one staffer said, "If there is a threat, we will make the effort to comply".

WHO CAN COMPLAIN?

At the level of prime sponsor (called "recipient" in the regs), complaints may be brought by any individual or organization, including but not limited to, rejected applicants, program participants, subrecipients, contractors, staff of the recipient or subrecipient, labor unions, and community-based organizations (676.83(a)(3)). In addition, the Dept. of Labor itself can initiate an investigation of an alleged violation.

Contents of the Complaint.

All complaints filed with the prime sponsor must be in writing, and should include the following:

1) complainant's full name, phone number and address, and that of the prime sponsor;
2) a "clear and concise statement of the facts, including pertinent dates, constituting the alleged violation";
3) citation of the provisions of the act, regs and plans believed to have been violated, if they are known;
4) signature of the complainant, sworn before a notary public.

Although it is not necessary, individuals and organizations thinking of filing a complaint should consider obtaining legal counsel or other advocacy assistance, both in formulating the complaint, in gathering facts to prove the allegations, and in providing representation at the hearing. Free legal assistance may be available from the local Legal Services office. Such assistance would also be helpful in earlier efforts to resolve problems informally.

The complaint proceedure.

Each prime must establish a procedure for resolving complaints within

60 days of filing. This procedure must include a hearing within 30 days of filing, if one is requested. The prime must designate one individual to monitor the operation of its complaint process. (676.83(a)(b)).

Participants must receive, upon enrollment, a written description of the procedures, including notification of right to file a complaint and instructions on how to do so.

Beyond these generalizations procedures differ. Here is how one prime does it:

- Complaints must be filed with the contractor first, if the complaint originates there, rather than with the CETA administration.
- Any informal complaint procedures the contractor has must be followed before a formal complaint can be filed with CETA's Equal Opportunity Officer.
- A written complaint must be filed within 30 days of the violation OR within 15 days of the contractor's decision if the complaint originated there. (That is not much time!)
- A formal complaint must be in writing, but does not have to be on an official complaint form.
- The complaint may be submitted by mail or in person.
- Within 15 working days of receipt of the formal complaint, the Equal Opportunity Officer will:
    - review the evidence
    - conduct further investigation
    - hold an informal conference with the complainant and other involved parties
    - formulate a recommended solution
    - provide the complainant and other parties with a written statement of Findings and Determinations.

Appeals

If the prime fails to conduct an investigation or does not made a decision within 60 days, or if the complainant is not satisfied with the prime's decision, an appeal can be made to the Regional Administrator (RA) of the Employment & Training Agency of the DOL. The RA must then make a prompt and formal investigation of the charges, and this investigation must be completed within 120 days of the filing of the complaint at the regional (i.e., Federal) level. If, upon completing the investigation, the RA finds that a violation has occurred, he or she can order the prime to take "corrective action" to remedy the violation.

Either party may request a hearing by an Administrative Law Judge, if the party disagrees with the RA's finding; and the Judge's decision becomes the "final decision" of the Secretary of Labor unless the Secretary modifies or vacates it within 30 days. Under certain circumstances this "final decision" can then be reviewed in a Federal Court of Appeals (Sec. 107).

Your case had better be airtight, with good statistical backing, to warrant the lengthy procedures involved in appeals. But if won, your case could have reverberations throughout CETA.

Since the complaint procedure differs from one prime sponsor to another, it would be a good idea to become familiar with it in advance of an actual complaint, by checking it all out with the Equal Opportunity Officer. If you are a participant, you should have already been apprised of the procedures (as noted above). If you have not been informed of them, as is required, this could itself be the basis of a complaint. The Equal Opportunity Officer is a good person to develop a positive working relationship with in any case. Ask what proportion of complaints are resolved in favor of the complainant. In the case of the prime sponsor used as an example, rulings generally go in favor of a participant turned down unjustly.

How to use the complaint procedure for advocacy purposes.

As stated in Chapter III, you start out with the assumption that CETA and all its personnel are gung ho about implementing the Act as written, believe in fair share for all eligibles, and are searching for viable proposals to make it all happen. Only when there is clear evidence that this is not the case do you use the complaint procedure to help bring it in line.

How? Suppose older women are making no headway despite valid efforts. An activist women's group might file a documented complaint about lack of services to this constituency, while potential service providers present proposals. In this way you paint the prime into a corner but then show it a way out. The complaint can be negotiated away by acceptance of a proposal, or at least by improving services to older women. The value of the complaint in this case is as a negotiating tool.

Or suppose the prime is ignoring displaced homemakers because "the need has not been properly established , yet refuses to fund a survey to obtain the necessary information. File a complaint, because the prime is not even permitting your significant segment to challenge the prime's analysis of disadvantaged groups. Again, the complaint can be a useful tool for negotiation, which could be resolved only with forward movement by the prime.

In other words, view a complaint as a method of redressing a specific grievance for an individual which may open the doorway to others in like situation, as a method of putting pressure on an intransigent prime, or as one step in the campaign for recognition of the needs of older women. Prime sponsors (or contractors or bureaucrats in the state CETA office) don't like complaints, especially valid ones. So you can use them as leverage when sweet persuasion fails.

THE LAWSUIT AND OTHER LEGAL REMEDIES

Complainants also have the right to go to court, after exhausting administrative remedies, including appeals, but lawsuits are lengthy and expensive. However, you can also utilize legal remedies short of a full-blown civil suit, to help make administrative remedies work. Sometimes just the hint of a lawsuit by taking the preliminary steps will get negotiation started (like threat of a strike). Public officials are always vulnerable to bad publicity generated by lawsuits. To pursue the avenue of a suit or other legal action, consult an attorney about the strategy and technical details, but here are some general considerations.

Restraining Orders. If despite your efforts, the prime sponsor is not fulfilling its contract with the Regional Administrator (RA) of the ETA despite your efforts- in other words, if the parts of the plan significant to older women are not being implemented, you can go over the prime's head. For example, you could go to court for an order restraining the RA from distributing funds to the prime because of violations of the contract. A restraining order puts tremendous pressure on the prime because it can result in action against the prime very quickly, unlike a lawsuit. Because the purpose of a restraining order is to prevent "irreparable harm" to the petitioners, it can go into effect immediately.

Or you might ask to meet with the representative of the DOL responsible for the contract of your prime. This person is the link between the prime sponsor and the Regional Administrator. Discuss with him/her your intent to seek a restraining order because of alleged violations of the contract. You may not have to get the restraining order at all, because you may find sudden willingness on the part of prime sponsor staff to negotiate a resolution of the conflict.

The main value of a restraining order is that it forces immediate attention to the problem you are raising, and is a powerful negotiating tool. The results may not be completely to your liking, but a resolution of some kind will occur.

Civil actions under other laws.

A provision of interest to older women (and their advocates) in terms of enforcing their right to fair participation in CETA is section 676.81(c). This regulation provides that if a prime sponsor or other recipient of funds has violated any section of the CETA Act or regulations and that violation also violates some other law or Constitutional provision, a civil action may be brought against the prime sponsor or recipient without exhausting the CETA administrative procedures. However, the regulation also states that no person shall file a suit which "includes a violation of CETA or these regulations" or which includes the Secretary of Labor as a defendant, without first exhausting the "administrative remedies" set out in the regulations.

This means, in effect, that if a recipient violates CETA and some other law, it can be sued on the basis of the other law but not on the basis of violating CETA unless the "administrative remedies" have been exhausted. The complainant can file a complaint under the other law with respect to the non-CETA cause of action, and also file an administrative complaint under CETA (676.83(a)(6). The complainant would thus have two independent chances of winning redress.

Any act of discrimination by a CETA prime sponsor or contractor, or of denial of equal employment or training opportunity in a CETA program on account of race, sex or age is almost certain to be a violation of both CETA and of another Federal statute (in most states, also of a state anti-discrimination statute). Discrimination in employment on account of race, sex, national origin or religion is a violation of Title VII of the Civil Rights Act of 1964.

Discrimination in employment on account of age is, in most situations, a violation of the Age Discrimination in Employment Act (ADEA).* However, age discrimination in CETA programs does not fall under the ADEA, but rather under the Age Discrimination Act of 1975 (ADA). This Act, amended in 1978, applies to discrimination on account of age in programs receiving Federal funds; and its coverage of CETA programs is specifically stated in the Act.

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* See Resources

The ADA, as it applies to CETA age discrimination, will not be enforceable until the DOL promulgates its own ADA Regs and it is unlikely that the final DOL Regs will be completed before early in 1980. Filing complaints of age discrimination under the ADA, when clearcut cases come to the fore, can perform an important consciousness-raising function and may quickly lead to remedial action.

Life is unfair and so is CETA. But the person who knows the rules, plays by the rule book and is not afraid to fight is more likely to make CETA play fair than the person who just complains.

"Guilty as charged - AGEIST AND SEXIST!"

IX. WHERE DO WE GO FROM HERE?

Unless enough wind can be stirred up to ruffle the beast's feathers and make its pinwheel turn, the promises of the new CETA are likely to remain dormant. Many laws do that, documenting good intentions and voter pressure, but are starved by lack of dollars for implementation and/or commitment. CETA's innovative aspects may be given only token treatment. A demonstration project here, a study there. "Model" projects, good as they may be, usually function as safety valves to reduce pressure of activists and are not intended to be duplicated more widely. "Of course we are concerned about older women. See our project in (wherever)."

But wind can be stirred up, as already demonstrated. Over time, consciousness can be raised to a point where there is broad understanding and concern for the double jeopardy of age and sex. But for that to happen, there must be a movement. Which means first of all that older women must recognize that a good share of our problems are social ones that can be tackled collectively. Second, it means commitment to action by enough of us to make it clear that the impetus is coming from many sources, not just a few individuals. Third, it means building as broad a support base and developing as many allies as we can. This last will not be difficult if we accomplish the first two.

So far, this manual has dealt primarily with local advocacy, but to make the wind blow, a national perspective is essential. Networking is the name of that game, and sharing of both successes and failures in trying to tame the CETA beast. For example, if we can collect documented case histories and statistics from all over the country, we would have the research background to negotiate with CETA from a position of strength. And if that did not bring results, the same information could be utilized to promote necessary legislative change, become the basis of legal action, or provide effective arguments for changing regulations.

Specifically how should this be done? The Displaced Homemakers Network already functions as a coordinating body in Washington and in the ten federal regions with respect to this constituency. If each local program for displaced homemakers sends to that Washington office* copies of complaints or detailed narratives of either problems or advocacy strategies, as well as copies of reports and proposals, that Network will have the raw materials to bring constructive pressure to bear at the top.

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* Displaced Homemakers Network, Inc., c/o BPW Foundation, 2012 Massachusetts Ave. NW, Washington, DC 20036

Here are a number of regulations which may give trouble and should be watched:

> displaced homemakers: Section 675.4 defines a displaced homemaker in part as one who has not worked in the labor force "for a substantial number of years". This has been interpreted by the Department of Labor in a field memo to mean 5 or more years. All programs should be scrutinized closely to see if implementation under this interpretation changes the focus from middle-aged and older women who are, according to the legislative history of the Act, the intended recipients of services for displaced homemakers. If middle-aged and older women are being underserved, the meaning of "substantial" should be revised upward.
>
> unemployed person: This term, currently defined in 676.4 as one who is "seeking and available for work". Will this be interpreted to exclude discouraged workers including older women who have not been looking for a job because they felt there were none? Will outreach be encouraged?
>
> determination of priorities for service: The primes have total discretion in setting priorities; they need only say how they set them (676.10-4(c)(1)(ii)). Are these priorities consistent with the requirements and objectives of CETA? How do displaced homemakers and older workers fare in the priority system of most primes? Should not priorities be reviewed each year in the Annual Plan?
>
> reasonable expectation of work: Sec. 676.23-1(b)(1) states that primes may refer a person for occupational training only after determining that there is a reasonable expectation of employment in the occupation in which the person would be trained. Will this regulation be used to continue the past practice of excluding older women from training because of assumed age and/or sex discrimination in obtaining employment?

These are just a sample of regulations which could present difficulties for older women, but to change them will require detailed grassroots experience.

The regulations are reviewed and revised on a three-year cycle, but it's not too early to begin work on them now. And field memos which can be issued at any time also have impact on how programs are implemented.

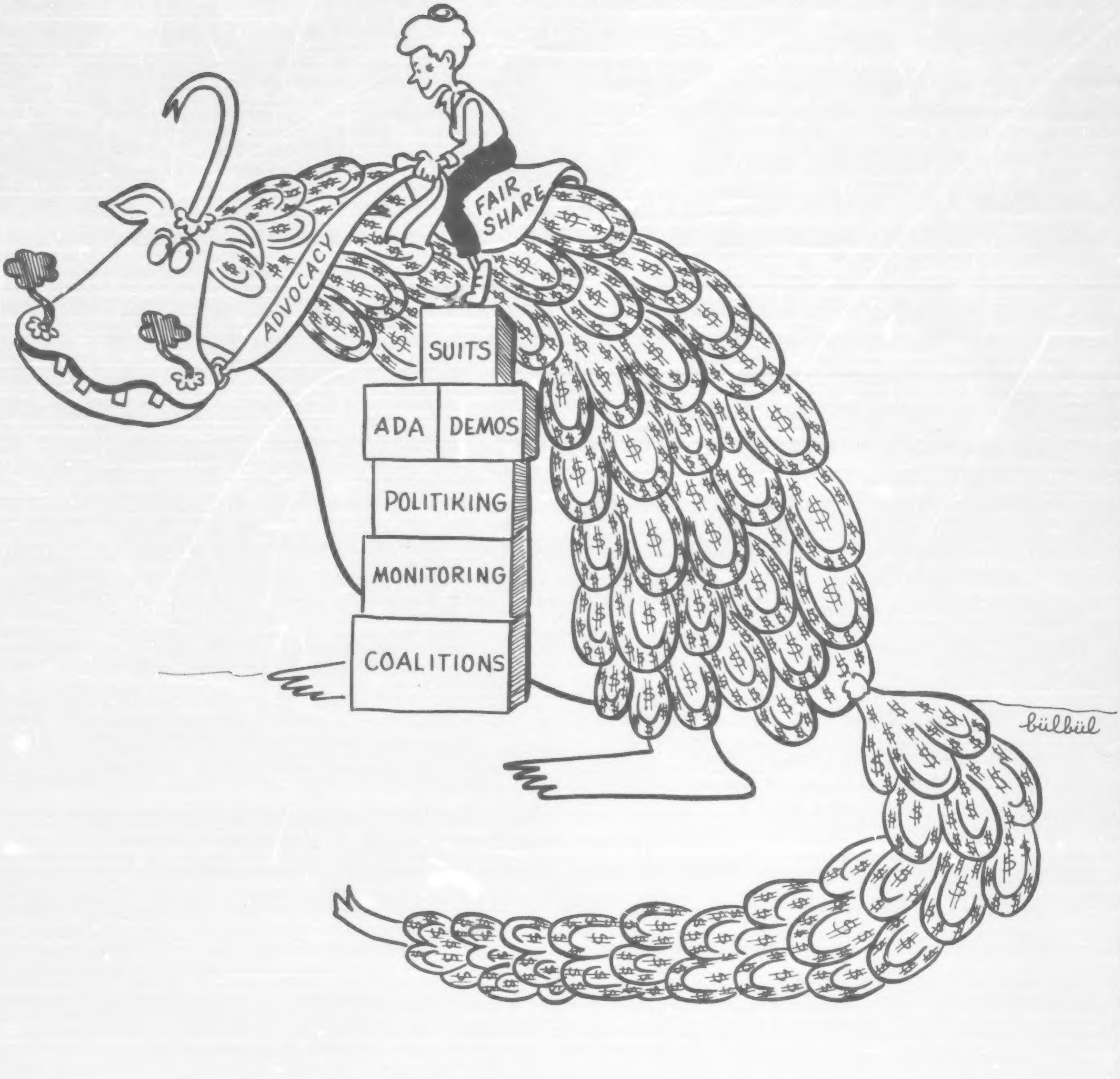
Collect case histories which show how individuals either fall through the cracks, are inappropriately served or completely ignored, as well as statistical data which could be useful.

In regard to older women who are not displaced homemakers and the "older worker" provisions of CETA, send similar material to the Older Women's League Educational Fund. For example, to what extent are aging advocacy organizations included in the planning process? Are state and area agencies on aging effectively involved in linkages? Has the prime sponsor initiated any programs for older workers outlined in Sec. 308, Title III? While there is not yet a coordinating body comparable to the Displaced Homemakers Network, there are a number of interested advocacy groups with which we can share this information.

An important area for some imaginative advocacy is the issue of cross-tabulation of statistics by age, sex, race, etc. While this is the intent of the Act there appears to have been slippage down the line, including the regs, the quarterly report forms, etc. Older women have the most to gain from this provision, so we should be in there fighting for it. Please share any progress or ideas for national advocacy on this issue with OWLEF and/or the Displaced Homemakers Network, since we will be working together on it.

We are in the beginning of a recession. Politically speaking, the likelihood of bold new ideas for social programs is remote, if not dead. But if unemployment were to suddenly rise, the political winds could shift quite suddenly, probably not to programs of the past, but rather to exploration of new panaceas.

Constructive social change usually comes about through small incremental steps brought about by hard work and dedication, with an occasional quake that readjusts the social order. To ride off with a fair share of CETA, we must be part of the action -- the planning process, job creation, service delivery and monitoring the whole works. As poet Mary Webb said, "Saddle your dreams afore you ride 'em".


ADVOCACY
FAIR SHARE
SUITS
ADA
DEMOS
POLITIKING
MONITORING
COALITIONS
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RESOURCES

Pertinent laws:

CETA Amendments of 1978, 29 U.S.C. §§801 et seq.(1978). This is the text of the "new CETA". All citations to "the Act" in this manual refer to this law.

CETA Regulations, 20 CFR Parts 675-79, 44 Fed. Reg. No. 65, Part IX, April 3, 1979. The agency administering CETA, DOL, has translated the intent of Congress into guidelines for day-to-day implementation of the Act. These guidelines are called regulations. All citations to "the regulations" in this manual can be found in the Federal Register part referred to above.

Age Discrimination Act (ADA), 42 U.S.C. §§6101 et seq. (as amended in 1978). This law prohibits discrimination on the basis of age in programs and activities receiving federal financial assistance, including CETA.

ADA Regulations, 45 CFR Part 90, Fed. Reg. No. 114, Part III, June 12, 1979. The agency administering the ADA, HEW, has issued these guidelines for day-to-day implementation of the ADA, based on Congressional intent. These are general regulations applicable to all federal agencies. Each agency will issue, in addition, regulations that specifically relate to its operations. The agency-specific regulations must be consistent with the general regulations.

Age Discrimination in Employment Act (ADEA), 29 U.S.C. §§621 et seq. (as amended 1978). This Act prohibits arbitrary age discrimination against individuals 40-69 in all areas of employment except CETA. CETA is covered by the ADA (see above). The ADEA also abolishes mandatory retirement for federal employees. All other employees are protected from mandatory retirement until the age of 70.

Comprehensive Older American Act, 1978 Amendments. (P.L. 95-478) 42 U.S.C.§§3001 et seq. The OAA provides social services to persons 60+ and some employment slots to low-income persons 55+. See Chapter III for further discription.

Economic Opportunities Amendment of 1978, (P.L. 95-568) 42 U.S.C.§§2809(a)(7). This law, administered by the Community Services Administration, authorizes experimental employment and training programs for the unemployed and underemployed with special emphasis on single heads of households with children and older workers. The Act is subject to the conditions set forth in CETA.

Educational Amendments of 1976, (P.L. 94-482), 20 U.S.C. §§2330 et seq. These amendments allocate federal funds through approved state voc ed plans. See Chapter III for a full description.

Career Education Incentive Act, 20 U.S.C. §§1865, 2502, 2601-14. This Act appropriates funds for model programs designed to eliminate or overcome bias and stereotyping on account of race, sex, age, economic status or handicap. Chapter III contains further information on this Act.

Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§200 *et seq*. Title VII prohibits discrimination in employment on the basis of sex or race.

Title IX of the Education Amendments of 1972, 20 U.S.C. §§1681-83. Title IX prohibits discrimination in educational programs or activities receiving federal financial assistance on the basis of sex.

Equal Employment Opportunity in Apprenticeship and Training, 29 Code of Federal Regulations §30. These regulations prohibit discrimination in the recruitment, selection, employment, and training of apprentices because of sex or race.

Women's Educational Equity Act, 20 U.S.C. §§341 *et seq*. This Act makes grants available to public agencies, private non-profit institutions, and individuals to advance the goal of educational equality for women. See Chapter III for further discussion of the Act.

Targeted Jobs Tax Credit, 26 U.S.C. §§51, 52, 53. This part of the Internal Revenue Code permits employers to receive a tax credit of up to $3,000 for each economically disadvantaged person they hire for certain categories, including AFDC and SSI recipients and handicapped persons.

Law Enforcement Assistance Act, 42 U.S.C. §§3711 *et seq*. Grants are made under this Act for projects relating to law enforcement and criminal justice.

Documents from Government Agencies:

The Age Discrimination Study, U.S. Commission on Civil Rights, Jan. 1979. Part II of the study documents age discrimination in a number of areas, including CETA. (pp. 117-170).

Report on Single Heads of Households, National Commission for Employment Policy, June, 1979. Useful statistical study of particular relevance to older women. Also indicates the huge gap between persons eligible and available employment and training slots. 1522 K St. N.W., Suite 300, Washington, DC 20005.

Coordination of Employment Services for Handicappers (Nationwide Survey). Michigan Dept. of Labor, Bureau of Employment and Training, 1978. 188 p. Documents examples of interagency coordination between prime sponsors and various public and private agencies providing services to the handicapped.

Obstacles & Opportunities for Employment of Older Persons In California, Tish Sommers, California Commission on Aging, 1978. For free copy write CCOA, P.O. Box 350, Sacramento, CA 95802. Documents issues and proposed solutions which emerged from statewide hearings. Applicable to other states. 56 p.

Supplementary technical information available from Women's Bureau, DOL, Washington, DC 20210 (as of 7/79):

A Guide to Coordinating CETA/Vocational Education Legislation Affecting Displaced Homemaker Programs, May, 1979. Women's Bureau and Bureau of Occupational & Adult Education in the U.S. Office of Education provides a "matrix" which summarizes and compares provisions of the two bills and discusses relevant sections for displaced homemaker programs.

Women's Bureau kit for women's organizations, April, 1979. Contains final regs of pertinent CETA titles; sections of rules of particular significance for women's organizations and businesses owned by women; Prime Sponsor planning schedule for FY 1980; review of CETA Reauthorization (Public Law 95-254); summary of participation of women in CETA decision making; directory of state employment and training services councils.

Tables Pertinent to Women and Displaced Homemakers by Selected Characteristics, July 13, 1979. Provides such data as is currently available on the target population, displaced homemakers, by age groups.

Non-governmental materials for advocacy:

NETWORK NEWS. Displaced Homemakers Network, Inc. c/o Business and Professional Women's Foundation, 2012 Massachusetts Ave. N.W., Washington, DC 20036. Detailed information for programs seeking CETA funding for displaced homemakers. Also: Displaced Homemakers: Programs Options. Manual on setting up displaced homemaker programs. ($13.25); Displaced Homemaker Program Directory. Lists all such programs as of August, 1979. ($1.50).

Shortchanged and Slighted: An Assessment of the D.O.L.'s National Response to Women's Employment and Training Needs, January, 1979. Women's Work Force (Advocacy Network for Women's Employment Programs), 1649 K St. N.E., 4th floor, Washington, DC 20006. Documents some of the shortcomings of CETA in regard to women and makes recommendations.

CETA. A Citizen's Action Guide, revised April 1979. Center for Community Change, 1000 Wisconsin Ave. N.W., Washington, DC 20007. A well designed summary of provisions in the ACT, together with action strategies for community groups. ($1.50). Related citizen's action guides also available.

CETA Monitoring Memo. League of Women Voters Education Fund, 1730 M St. N.W., Washington, DC 20036. June, 1978. Useful information for groups interested in monitoring CETA on state or local level.

Age Audits in Employment: Data and Instruments, Michael D. Batten. Clearinghouse on Employment for the Aging, 80 Reid Ave., Port Washington, NY 11050, 1977. Excellent methodology for accurate data gathering on older unemployed.

Employment Services for Older Job Seekers. Human Resources Research Organization, 300 N. Washington St., Alexandria, VA 22314. A study of employment services available to older workers, funded by the AOA. Includes usable statistics, charts and documented supportive materials for advocacy. June, 1978, 225 p.

CETA Litigation Kit. National Employment Law Project, 475 Riverside Drive, New York, NY 10027. Kit includes summary of 1978 amendments, model complaint and model interrogatories. The Project also offers various support services.

Survey of Working Women, National Commission on Working Women, 1211 Connecticut Ave., NW, Suite 400, Washington DC 20036, 1978. Summarizes 150,000 questionnaires,from "the 80% of women in the labor force concentrated in lower-paying, lower-status" jobs. ($2.00)

The People's Guide to a Community Work Center. Sidney Brown, NEW WAYS TO WORK. A basic "how-to" for setting up and running an employment oriented center. Includes job finding and creation as well as the nuts and bolts. 1977, 50 p., ($4.75 inc. postage). Other resources include: Adjusting Work Time, A New Ways to Work position paper, Sept. 1978; Working Less but Enjoying It More, a description of the job sharing process. For publications list, write New Ways to Work, 149 Ninth St., San Francisco, CA 94103.

Older Americans: An Untapped Resource. National Committee on Careers for Older Americans. Good background material on why and how to employ older persons, 1979, 87 p. ($8.50). Write NCCOA, 1414 22nd St. N.W., Washington, DC 20037.

SER 1978 Annual Report: Building Human Resources. SER-Jobs for Progress, Inc. is an example of a non-profit, community based organization, with emphasis on the Hispanic population, which has become a community development corporation of national scope. Concerned with displaced homemakers. For information, write Josephine Segura, Women's Division Adm. SER-Jobs for Progress, 9841 Airport Blvd., Los Angeles, CA 90045.

New CETA Regulations: Some Improvement for Women. Women's Work Force, a national resource and advocacy network for women's employment programs. 1649 K St. N.W., 4th floor, Washington DC 20006. (202)638-4868.

Commerce Business Daily, Rm. 1304, 433 W. Van Buren, Chicago, Ill. 60607. Not an advocacy resource but a proposal writer's tool. Lists RFP's from all government departments. Available in some libraries or by subscription ($80 per year).

Regional Offices of ETA:

Region I (CT, ME, MA, NH, RI, VT)
J.F. Kennedy Bldg., Rm. 1703, Boston MA 02203, (617)223-6440

Region II (NJ, NY, Can. Zone, P.R., V.I.)
1515 Broadway, Rm. 3713, NY, NY 10036, (212)399-5445

Region III (DE, MD, PA, VA, WV, D.C.)
P.O. Box 8796, Phila., PA 19101 (215)596-6336

Region IV (AL, FL, GA, KY, MS, NC, SC, TN)
1371 Peachtree St., N.W., Room 405, Atlanta, GA 30309 (404)257-4411

Region V (IL, IN, MI, MN, OH, WI)
230 S. Dearborn St., Chicago, IL 60604 (312)353-0313

Region VI (AR, LA, NM, OK, TX)
555 Griffin Sq. Bldg., Rm. 316, Dallas, TX 75202 (214)729-6880

Region VII (IA, KS, MO, NE)
911 Walnut St., Rm 1000, Kansas City, MO 64106 (816)374-3796

Region VIII (CO, MT, ND, SD, UT, WY)
1961 South St., Denver, CO 80202 (303)837-4477

Region IX (AZ, CA, HI, NV, Trust Terr. of Pacific Islands, Guam, Amer. Samoa)
ETA, U.S. Dept. of Labor, Box 36084, San Francisco, CA 94102 (415)556-7414

Region X (AK, ID, OR, WA)
1145 Federal Office Gldg., 909 First Ave., Seattle WA 98174 (206)442-7700

"CETA-SPEAK" GLOSSARY

Every bureaucracy including CETA has its own language made up of abbreviations, acronyms and its own peculiar use of commonly used words and phrases. Below are a few selections from this alphabet soup and their translations.

AAA - Area Agency on Aging, local administrator of programs under the Older Americans Act.

ADA - Age Discrimination Act, described under Resources.

ADEA - Age Discrimination in Employment Act, described under Resources.

AFDC - Aid to Families with Dependent Children, welfare program administered by states.

AOA - Administration on Aging, federal agency which administers the Older Americans Act.

BLS - Bureau of Labor Statistics, part of the Department of Labor.

CBO - Community-based organization, private non-profit groups which represent the views of the community or part of it, rather than government or business.

CETA - Comprehensive Employment and Training Act.

CETP - Comprehensive Employment and Training Plan, the master plan and annual plan together.

DOL - The Department of Labor, the federal agency which administers CETA.

ETA - Employment and Training Agency, the division of the DOL which administers CETA.

FY 80 - Fiscal year 1980, starts October 1, 1979.

GA - General Assistance. County administered welfare for those ineligible for AFDC and SSI. Very low and spotty.

LEA - Local education agency, such as a board of education, community college, adult achool, etc.

LEAA - Law Enforcement Assistance Act (or Administration). Concerned with criminal justice and community crime prevention.

OJT - On-the-job training.

ONP - Office of National Projects of the DOL, coordinates Title III projects.

PIC - Private Industry Council, appointed by the prime sponsor to increase the involvement of the business community in CETA.

PS - Prime Sponsor - also called "recipient" in the regs. Local governmental body which administers CETA funds.

PSE - Public service employment, jobs available through CETA that provide services to the public.

RA - Regional administrator, the person who heads the regional office of the DOL. (The Women's Bureau also has R.A's)

Regs - Regulations or rules to implement any law, prepared by the administering agency.

RFP - Request for proposal.

SESA - State Employment Services Agency, state agency which provides public employment services, name varies from state to state. For example, the California SESA is EDD, Employment Development Department.

SSI - Supplemental Security Income. Welfare program for persons 65+ and for the handicapped.

TETC - Targeted Employment Tax Credit. Program which provides tax credits to employers who employ CETA-referred workers on AFDC or SSI.

WIN - Work Incentive program, geared to welfare recipients, administered by DOL.

1979 Adult CETA Eligibility Regulations at a Glance

A. TITLE II, Part B

1. a) Unemployed continuously for one week or longer or receiving PA

   or b) Underemployed (working full-time and receiving wages less than higher of poverty line or 70% of BLS lower living standard or working part-time but seeking full-time work)

   or c) In school youth (age 14-24 inclusive and enrolled full-time)

and 2. Disadvantaged

   a) Family income* less than the poverty line or 70% of BLS lower living standard

   b) Family receives public assistance (AFDC, SSI, GA) or would have qualified had it applied

A. TITLE II, Part D (Transitional PSE)

1. a) Disadvantaged (As defined in TITLE II, Part B)

   and b) Unemployed at time of enrollment

   and c) Unemployed during 15 or 20 weeks immediately prior to enrollment

or 2. Family receiving public assistance (AFDC, SSI, GA)

B. TITLE VI (Permanent PSE)

1. a) Unemployed at time of enrollment

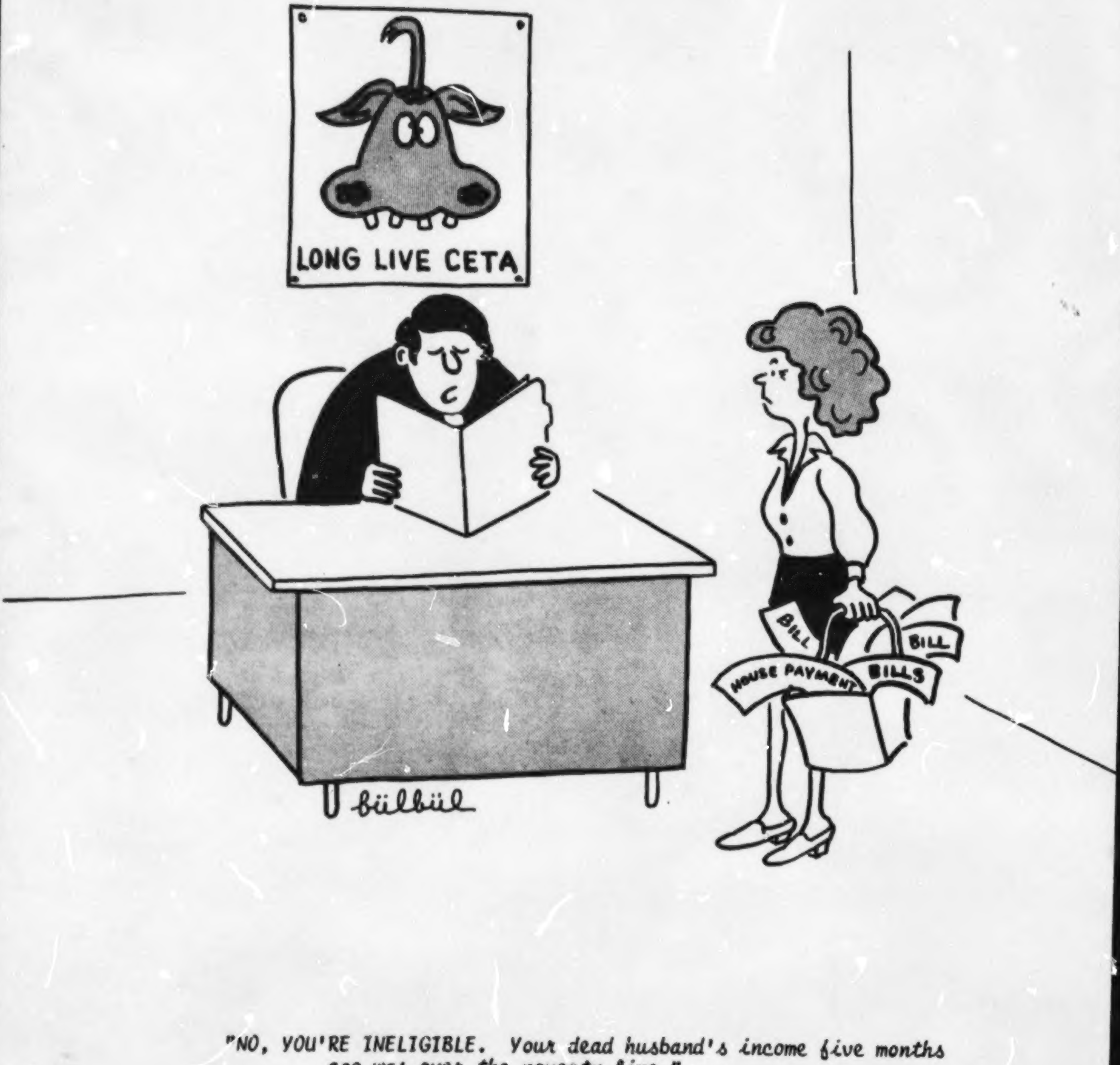
   and b) Unemployed at least 10 of 12 weeks immediately prior to enrollment

   and c) Family income at or less than 100% of lower living standard (based on 3 month period prior to application for participation)

or 2. Family receiving public assistance (AFDC, SSI, GA) for 10 out of 12 weeks prior to enrollment

*Income is measured over six months

Source: Report on Single Heads of Households, National Commission for Employment Policy. June, 1979. (See Resources)



"NO, YOU'RE INELIGIBLE. *Your dead husband's income five months ago was over the poverty line."*

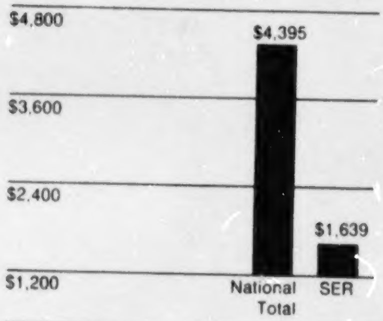
Example of statistical presentation to show performance of agency to best advantage. Emphasis is on cost effectiveness. SER is a well established agency of national scope, with emphasis on Hispanic population. See Resources.

Performance

SER has an established tradition of cost-effective program management, and last year it continued as one of the nation's most efficiently run community-based-organizations. Listed below are some of the year's highlights, indicating SER's outstanding performance.

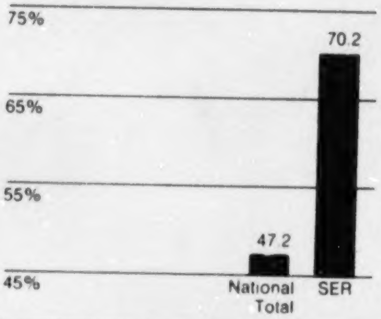
- Extensive program expansion was achieved in fiscal year 1978. The total funding level for the National SER Network increased from $43.5 million to $51 million.
- The total number of persons served by the SER program rose from 39,000 in fiscal 1977 to 50,000 in fiscal 1978.
- SER employed over 1,400 people in the national network in 1978.
- Twenty-one new offices were opened.
- New SER programs aimed at the special needs of veterans and youth were funded.
- A new field office assuming responsibility for the East Coast region was opened in Philadelphia, Pennsylvania.
- The Youth Programs office was established in Washington, D.C.

Cost Per Placement



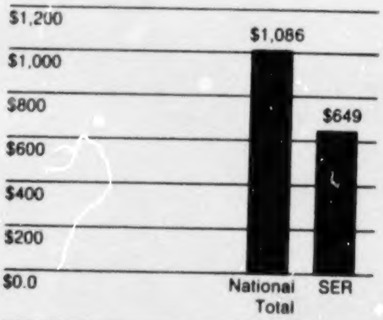
This graph indicates SER's cost-effectiveness. SER's cost per placement was a low $1,639 in 1978. The national cost per placement was $4,395, indicating that SER placed each client at 37% of the national cost.

Total Placement Rate



SER exceeded the national average in the placement of CETA clients. SER placed 70.2% of its participants into permanent, unsubsidized jobs in 1978. This compares to a national placement rate of 47.2%.

Cost Per Client



In 1978, the Department of Labor paid $1,086 per client enrolled in programs under CETA. SER's average cost per participant was only $649 or 40% of the national figure.

(Sample letter to request information)

Your Letterhead

Date

Name of Official
Manpower Director (or correct title)
Name of Prime Sponsor (such as Manpower Agency Planning & Administration)
Address

Dear Mr. (Ms?),

We are currently seeking age-related information about CETA enrollees, training programs, applicants and permanent non-subsidized placements. As you know, older workers are targeted by the DOL in regulations pertaining to implementation of CETA, but are not necessarily included in the plans submitted by Prime Sponsors. Our purpose for seeking such data is to determine whether our constituency is receiving a "fair share" of CETA jobs and services in this community.

We therefore request copies of your quarterly reports for the past year as well as any other participant characteristics statistics you can provide us. We would also like to see a copy of your Annual and Master Plans as submitted to DOL to determine the extent of the utilization of CETA training opportunities and jobs by older workers. If copies of the plan are not available, what hours are convenient to study these documents in your office?

Thank you very much for your time and effort in providing this information.

Yours very truly,

Similar letters could request information concerning displaced homemakers or statistics cross-tabulated by age and sex, etc.